

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RAJAN PATEL)	
)	
Plaintiffs,)	Civil Action No. 2:21-cv-00546
)	
v.)	
)	Hon. Nitza I. Quiñones-Alejandro
ECFMG,)	
)	
Defendant.)	

[PROPOSED] ORDER

AND NOW, this __ day of _____ 2021, upon consideration of Defendant's Motion to Dismiss Plaintiff's Amended Complaint, **IT IS HEREBY ORDERED** that the Motion to Dismiss Plaintiff's Amended Complaint is **GRANTED**. Plaintiff's Amended Complaint is **DISMISSED WITH PREJUDICE**.

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)	
Defendant.)	

DEFENDANT’S MOTION TO DISMISS PLAINTIFF’S AMENDED COMPLAINT

For the reasons set forth in the attached memorandum of law, Defendant ECFMG, by and through its undersigned counsel, moves to dismiss Plaintiff’s Amended Complaint against ECFMG pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

Dated: October 1, 2021

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**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS
PLAINTIFF’S AMENDED COMPLAINT**

Dated: October 1, 2021

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I. INTRODUCTION

Defendant ECFMG¹—a private non-profit organization that (among other things) certifies whether international medical graduates (“IMGs”) have met minimum requirements to be eligible for medical residency programs in the United States—moves for dismissal of Plaintiff Rajan Patel’s Amended Complaint against it. As part of its certification requirements, ECFMG mandates that IMGs take and pass certain tests within a seven-year period (the “Seven-Year Rule”). If an IMG fails to do so, the first passing score becomes invalid, and a new seven-year period begins to run from the date of the next-passing score. The Seven-Year Rule does not prohibit IMGs from taking examinations; it is focused only on the validity of the scores for purposes of ECFMG Certification. And in certain circumstances, ECFMG may give IMGs limited exception to the Seven-Year Rule after all of the required exams are passed (so that ECFMG’s Medical Education Credentials Committee of its Board of Trustees (the “MECC”) can consider the length of the exception being sought).

Plaintiff claims that he has been unable to complete the last of the required exams within seven years of his first pass date because of the COVID-19 pandemic. According to Plaintiff, because of a medical condition, he is unable to take his third and final test while wearing a mask in accordance with the policies of the test administrator—Prometric—and Prometric allegedly informed Plaintiff that it would not provide him an accommodation under the Americans with Disabilities Act until ECFMG stated in writing that Plaintiff’s seven-year window would be extended.

As Plaintiff explains in his Amended Complaint, the nub of his allegations against ECFMG is that ECFMG has informed him that he would not be eligible to apply for an exception to the Seven-

¹ Plaintiff named “ECFMG” as the defendant in this action. As a matter of record, ECFMG’s full, legal name is the Educational Commission for Foreign Medical Graduates. However, for ease of reference, Defendant will refer to itself as “ECFMG.”

Year Rule until after he eventually takes and passes his third exam. Without such passage, ECFMG's MECC cannot know the length of the exception that is being sought. But Plaintiff discounts ECFMG's policies: through this lawsuit, Plaintiff asks this Court to undermine ECFMG's Seven-Year Rule and impose a preemptive, potentially open-ended exception for him, essentially putting this Court in the place of the ECFMG's MECC to decide what examination timing is sufficient for the purposes of ECFMG Certification.

As is detailed below, and as was true of Plaintiff's original Complaint, Plaintiff's Amended Complaint fails to state a claim against ECFMG upon which relief can be granted. Nothing in Plaintiff's Amended Complaint changes that. Plaintiff cannot establish that he has yet suffered an injury as a result of ECFMG's actions. Consequently, there is no active "case or controversy," and the allegations in the Amended Complaint are not ripe for judicial review. Moreover, Plaintiff's Amended Complaint fails to state any claim upon which relief may be granted. Because of these deficiencies, the Court should dismiss the Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

II. BACKGROUND²

A. ECFMG.

ECFMG is a private non-profit corporation that promotes quality health care for the public by certifying physicians who received their basic medical degree from an international medical

² In ruling on a motion to dismiss, the Court "must accept all of the complaint's well-pleaded facts as true, but may disregard any legal conclusions." *Fowler v. UPMC Shadyside*, 578 F.3d 203, 210–11 (3d Cir. 2009). Accordingly, the "Background" set forth herein assumes the truth of Plaintiff's "well-pleaded facts" and does not accept as true the allegations in the Amended Complaint that constitute no more than "legal conclusions."

Moreover, "[i]n deciding motions to dismiss . . . courts generally consider only the allegations in the complaint, exhibits attached to the complaint, matters of public record, and documents that form the basis of a claim." *Lum v. Bank of Am.*, 361 F.3d 217, 221 n.3 (3d Cir. 2004); see *Winer*

school (known as international medical graduates or “IMGs”) for entry into U.S. graduate medical education. Exh. A, p. 6 of 60. ECFMG Certification signals to directors of accredited residency and fellowship programs that an IMG has satisfied certain minimum requirements; it is not a license for an IMG to practice medicine in the United States. Exh. A, p. 7 of 60.

B. ECFMG’s Seven-Year Rule.

Candidates to practice medicine in the United States must take and pass a standardized test called the United States Medical Licensing Examination (“USMLE”), which is offered in parts (sometimes called “Steps”). Exh. A, pp. 6, 31 of 60. The USMLE is sponsored by the Federation of State Medical Boards and the National Board of Medical Examiners. Exh. A, p. 30 of 60.

ECFMG has policies and procedures, which it applies to further its mission. *See generally* Exh. A. One example of ECFMG’s policies is the Seven-Year Rule, under which IMGs seeking ECFMG certification must pass the USMLE exams required for ECFMG certification within seven years of one another, helping to ensure that applicants’ medical knowledge remains current. *Id.* at pp. 23-24 of 60. If an IMG does not pass the required Steps within seven years, the IMG’s earliest passed exam is no longer valid for ECFMG Certification, and the IMG’s new seven-year period begins to run from the next Step exam after the now-invalidated exam. Exh. A at p. 23 of 60. Notably, failure to comply with the Seven-Year Rule ***does not*** result in disqualification or

Fam. Trust v. Queen, 503 F.3d 319, 327 (3d Cir. 2007). “This includes examining additional sources courts normally consider when ruling on a motion to dismiss, ‘in particular, documents incorporated into the complaint by reference, and matters of which a court may take judicial notice.’” *Winer*, 503 F.3d at 327 (quoting *Tellabs, Inc. v. Makor Issues & Rights, Ltd.*, 551 U.S. 308, 322 (2007)). Pursuant to this standard, ECFMG submits along with this Motion for the Court’s consideration the ECFMG 2020 Information Booklet, attached hereto as Exhibit A and available online at <https://www.ecfmg.org/2020ib/2020ib.pdf>, which was explained in, albeit not attached to, the Amended Complaint. ECFMG also submits along with this Motion for the Court’s consideration a letter ECFMG sent to Plaintiff, which Plaintiff references never having been sent in the Amended Complaint, and which is attached hereto as Exhibit B.

ineligibility from ECFMG certification; at worst, it delays the certification process. *Id.* at pp. 23-24 of 60.

C. Exception Requests to ECFMG’s Seven-Year Rule.

In some cases when IMGs cannot meet ECFMG’s certification requirements for any reason, IMGs may seek an exception from ECFMG. As Plaintiff explained in his Amended Complaint, when IMGs do not anticipate passing the required exams within seven years and intend to seek an exception to the Seven-Year Rule, ECFMG staff asks that all required exams be taken and passed before an exception will be entertained. *See* ECF 24-3, p. 7 of 8 (“ECFMG stated in writing to me that it will only consider extending my seven year window AFTER I pass this last exam that is remaining for me to take.”) (emphasis in original). This provides ECFMG the opportunity to consider the actual amount of time requested for the exception, instead of some vague unending statement of projected need—for example, asking ECFMG to issue a “reasonable deadline,” as Plaintiff included in his Amended Complaint. *See id.* Moreover, it protects against the potential of an IMG seeking serial extensions if/when the IMG cannot pass the exam(s) at issue.

D. Plaintiff Rajan Patel and His Amended Complaint.

Plaintiff Rajan Patel is an IMG who is attempting to become ECFMG Certified. ECF 24-3, p. 1 of 8. Therefore, the Seven-Year Rule applies to him, like all other IMGs. *Id.*; Exh. A, 23-24 of 60. As Plaintiff explains in his Amended Complaint, his “seven years were up at the end of June 2020,” meaning his seven-year window started in June 2013. ECF 24-3, p. 1 of 8. By ECFMG’s policies, he would therefore have two options to continue on to ECFMG Certification (assuming he has satisfied all other requirements), *both of which require that he take and pass his final not-yet-passed exam*: (1) after passing his last examination, re-take his earliest passed

exam(s), so that all passes would be valid within the same 7-year window; or (2) after passing his last examination, seek an exception from ECFMG to count his passes as all valid, even though they were not within a seven-year window. Plaintiff chose not to pursue either of those routes and instead of sitting for (and passing) his not-yet-passed exam, he chose to sue ECFMG for an undefined exception to ECFMG's Seven-Year Rule.

E. Plaintiff's Accommodation Requests to Prometric.

Plaintiff blames his refusal to take the exam on a mask mandate due to COVID-19 and his medical condition; according to Plaintiff, Prometric (the company administering the USMLE tests) instituted a mask mandate for testing, and Plaintiff's asthma prevents him from wearing a mask for an extended period of time. ECF 24-3, p. 1 of 8. Plaintiff does not assign fault to ECFMG for his inability to take the exam. As Plaintiff readily acknowledges in his Amended Complaint, a request for him to modify his testing parameters (including the mask mandate) is to be made to Prometric (the testing company), *not* ECFMG:

I have asked the Prometric Test Centers if they can provide me with an accommodation (ADA- Reasonable accommodation) whereby I am allowed to take the test in a separate room without a mask, or some other way of allowing me to take the exam safely without wearing a mask (as an ADA Reasonable Accommodation due to my disability that is impairing me from take the exam under the normal but new policies with regards to wearing masks).

Id. at pp. 1-2 of 8. However, Prometric denied Plaintiff his request.

First, according to Plaintiff, Prometric denied his request for accommodation unconditionally, suggesting that Plaintiff wait “until after the pandemic is over and they go back to allowing test takers to take the exam without wearing a mask.” ECF 24-3, p. 2 of 8. Then, apparently, when Plaintiff explained that his seven-year window was about to expire, Prometric pivoted, stating that “it would allow [Plaintiff] to take the exam without wearing a mask (as an accommodation) if [he could] provide them proof of certainty that ECFMG says that it will waive

and extend temporarily, their seven year window for Plaintiff.” *Id.* According to Plaintiff, before September 1, 2020, Prometric provided “absolutely no option of requesting for an accommodation that allows one to take a test without wearing a mask.” *Id.*³

Plaintiff alleges in his Amended Complaint that “it is not unreasonable of Prometric to request this additional letter in order for it to grant a Reasonable Accommodation . . . that states that [he] has an upcoming deadline by which [he] need[s] to complete the exam in order to be certified by the ECFMG.” ECF 24-3, pp. 2-3 of 8. While not able to provide Prometric proof that it would extend Plaintiff’s seven-year window, on January 13, 2021, at Plaintiff’s request, ECFMG Vice President for Operations Kara Corrado gave Plaintiff a letter to be provided to Prometric, explaining the Seven-Year Rule, advising that Plaintiff has not completed his exams within his seven-year window, and asking Prometric to provide Plaintiff “[a]ny consideration . . . in permitting him to test as soon as possible.” *See* Exh. B.

Despite Plaintiff’s statements that such a letter would be “reasonable,” Plaintiff instead now requests in his Amended Complaint that ECFMG provide an immediate, unspecified exception to the Seven-Year Rule (“1-18 months from the date on the letter”), before he has even taken the exam, and notify Prometric of same. ECF 24-3, p. 3 of 8.

III. ARGUMENT

While all of the precise legal bases for Plaintiffs’ claims are not entirely clear from Plaintiff’s narrative *pro se* Amended Complaint, Plaintiff specifically cites to the Americans with Disabilities Act (“ADA”) and the Equal Educational Opportunities Act (“EEOA”).⁴ *See* ECF 24-

³ Notably, according to Plaintiff, his seven-year window ended months earlier in June 2020.

⁴ Plaintiff also makes reference to “other Pandemic related laws and executive orders.” ECF 24-3, p. 4 of 8. ECFMG is unaware of any legal requirements to which this statement refers; no Executive Order(s) required ECFMG to modify or disregard its Seven-Year Rule. Further, the

3, pp. 1-2, 4-5, 7 of 8. However, for the reasons stated *infra*, Plaintiff cannot state a claim for relief against ECFMG under either statutory authority. And even if he could, this case is not ripe for adjudication. Consequently, the Amended Complaint should be dismissed in its entirety with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

A. Plaintiff’s Amended Complaint Should Be Dismissed Because This Case Is Not Ripe.

“Article III of the Constitution limits the ‘Judicial Power’ of the United States to the adjudication of ‘Cases’ or ‘Controversies.’” *Pittsburgh Mack Sales & Serv. v. Int’l Union of Operating Engineers, Local Union No. 66*, 580 F.3d 185, 190 (3d Cir. 2009) (quoting Const., Art. III). Courts enforce such a requirement “through several justiciability doctrines that ‘cluster about Article III,’” including ripeness. *Id.* (quoting *Allen v. Wright*, 468 U.S. 737, 750 (1984)). “The function of the ripeness doctrine is to determine whether a party has brought an action prematurely,” *Peachlum v. City of York*, 333 F.3d 429, 433-34 (3d Cir. 2003) (quoting *Philadelphia Fed’n of Teachers v. Ridge*, 150 F.3d 319, 323 (3d Cir. 1998)), and “prevent[s] [federal] courts ‘through avoidance of premature adjudication, from entangling themselves in abstract disagreements.’” *Id.* (quoting *Abbott Labs v. Gardner*, 387 U.S. 136, 148 (1967)). To be ripe for judicial review, a legal challenge must “grow out of a ‘real, substantial controversy between parties’ involving a ‘dispute definite and concrete.’” *Peachlum*, 333 F.3d at 434 (quoting *Babbitt v. United Farm Workers Nat’l Union*, 442 U.S. 289, 298 (1979)). Courts generally

basis for this allegation is not clear from the facts alleged in the Amended Complaint. As such, the Court should ignore this conclusory and vague legal statement. *See, e.g., Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009); 5B Wright & Miller, Federal Practice and Procedure, § 1357 (3d 2004).

To the extent the Court construes Plaintiff to include other claims, including those related to due process, breach of contract, or employment, ECFMG refers to and incorporates by reference its arguments in its original Motion to Dismiss Plaintiff’s Complaint and Reply in Support of its Motion to Dismiss Plaintiff’s Complaint. *See* ECF 8-1, ECF 14.

presume that they “lack jurisdiction unless the contrary appears affirmatively from the record.” *Renne v. Geary*, 501 U.S. 312, 316 (1991) (quoting *Bender v. Williamsport Area Sch. Dist.*, 475 U.S. 534, 546 (1986)).

“The question in each case is whether the facts alleged show that there is a substantial controversy, between parties having adverse legal interests, ‘of sufficient immediacy and reality’ to justify judicial resolution.” *Peachlum*, 333 F.3d at 434 (quoting *Maryland Casualty Co. v. Pacific Coal & Oil Co.*, 312 U.S. 270, 273 (1941)). The Supreme Court has recognized that in determining ripeness, courts should consider “the fitness of the issues for judicial decision,” and “the hardship to the parties of withholding court consideration.” *Abbott Labs.*, 387 U.S. at 149. “A claim is not ripe for adjudication if it rests upon contingent future events that may not occur as anticipated, or indeed may not occur at all.” *Doe v. Cty. of Centre*, 242 F.3d 437, 453 (3d Cir. 2001) (quoting *Texas v. United States*, 523 U.S. 296, 300 (1998)); *see also Wyatt v. Gov’t of V.I.*, 385 F.3d 801, 806 (3d Cir. 2004) (“Claims based merely upon ‘assumed potential invasions’ of rights are not enough to warrant judicial intervention.”) (quoting *Ashwander v. Tenn. Valley Auth.*, 297 U.S. 288, 325 (1936)).

Here, Plaintiff has not alleged that he has suffered an injury at the hands of ECFMG. Rather, his allegations hinge on contingent, hypothetical future events. ECFMG has not prevented Plaintiff from doing anything: Plaintiff can take his remaining exam and then, once passed, decide whether he will (1) pursue re-taking his prior exam(s) that fall outside of seven years from his passage or (2) seek an exception from ECFMG to the Seven-Year Rule. Nothing ECFMG has said or done is standing in Plaintiff’s way.

Plaintiff alleges that ECFMG has refused to give a *preemptive* exception to one of its policies. But Plaintiff’s demand for an exception, and his claims here, are not yet ripe. It is unclear

if Plaintiff can or ever will pass the last remaining exam, even if ECFMG did grant him the unreasonable exception he requests; as such, it is a “contingent future event[.]” *Doe*, 242 F.3d at 453. And even if he does take and pass the exam at some unspecified time in the future—and even if it is outside of the allowed seven years—he would still not have yet have a claim against ECFMG because he would have at least two pathways to continue to his stated goal of becoming a licensed medical doctor in the United States, like many other ECFMG applicants over the years: either through re-take of his earlier passed exam(s) or through obtaining an exception from ECFMG. As such, Plaintiff would not suffer any hardship if the Court dismisses this case.

To counter these truths, Plaintiff insists that he has suffered “real losses and damages” as a result of ECFMG’s actions: ECFMG’s resistance to providing a preemptive exception to one of its rules is wasting time and creating a time gap in his testing history that he will not be able to explain to future employers. ECF 24-3, pp. 4-5 of 8 (“But due to ECFMG failing to accommodate, I have yet to take the exam, and thus have not been able to progress at all on my professional medical career path, as passage of this exam is a strict requirement to engage in any further medical training/licensure. I have lost close to one year in my medical career path.”). But this argument puts the cart before the horse and unwittingly supports ECFMG’s argument. Plaintiff has not yet taken his remaining exam, he has not formally requested an exception to ECFMG’s Seven-Year Rule, he has not yet re-taken any exams, he has not passed any of those exams, and he has not yet had to explain to any prospective future employers the gap in his examination history. Therefore, ***he has not yet suffered these hypothetical damages he alleges.*** Plaintiff cannot rest his case on such “contingent future events.” *Doe v. Cty. of Centre*, 242 F.3d 437, 453 (3d Cir. 2001) (quoting *Texas v. United States*, 523 U.S. 296, 300 (1998)).

Said simply, Plaintiff cannot bring a claim in court to remedy an injury that might one day befall him. Because each of the injuries Plaintiff alleges in his Amended Complaint is merely theoretical, this case is not ripe, and this Court lacks subject-matter jurisdiction over it. *See Boerger v. Levin*, 812 F. Supp. 564, 565 (E.D. Pa. 1993) (“Clearly, then, [plaintiff’s] cause of action is not yet ripe. His loss is not just reversible, or stayed; it is as yet nonexistent. [Plaintiff] can point to no actual loss which can constitute ‘injury[.]’”). Consequently, this Court should dismiss the Amended Complaint in its entirety and with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(1).

B. Plaintiff’s Amended Complaint Should Be Dismissed Because It Fails to State a Claim.

Even if the Court finds that Plaintiff’s claims against ECFMG are ripe (which they are not), the Court should still dismiss the Amended Complaint pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim. To survive a motion to dismiss, a complaint must state a “plausible claim for relief.” *Iqbal*, 556 U.S. at 679 (citing *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 556 (2007)). “A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.* at 678. This standard “demands more than an unadorned, the-defendant-unlawfully-harmed-me accusation.” *Id.* Rather, to survive a motion to dismiss, a complaint must allege facts sufficient to “raise a right to relief above the speculative level.” *Twombly*, 550 U.S. at 555; *Fowler*, 578 F.3d at 211. The Court thus must conduct a two-part analysis. *Id.* at 210. The Court must first accept Plaintiff’s factual allegations as true, and disregard legal conclusions or mere recitations of the elements. *Id.* at 210–11. The Court must then determine whether the facts alleged make out a “plausible” claim for relief. *Id.* at 211.

“Threadbare recitals of the elements of a cause of action, supported by mere conclusory statements, do not suffice.” *Iqbal*, 556 U.S. at 678; *see also* 5B Wright & Miller, Federal Practice and Procedure, § 1357 (3d 2004) (noting that courts have ignored a pleading’s “legal conclusions,” “unsupported conclusions,” “unwarranted inferences,” “unwarranted deductions,” or “sweeping legal conclusions cast in the form of factual allegations.”). Similarly, “[w]hen allegations in a complaint are contradicted by the materials appended to or referenced in the complaint, ‘the document controls and the court need not accept as true the allegations of the complaint.’” *Byers v. Intuit, Inc.*, No. 07-4753, 2009 WL 948651, at *2 (E.D. Pa. Mar. 18, 2009) (citing *Barnum v. Milbrook Care Ltd. P’ship*, 850 F. Supp. 1227, 1232–33 (S.D.N.Y. 1994)); *see also* *Plasko v. City of Pottsville*, 852 F. Supp. 1258, 1261 (E.D. Pa. 1994) (“Conclusory allegations are not acceptable . . . where no facts are alleged to support the conclusion or where the allegations are contradicted by the facts themselves.”). The pleading standard of Rule 8 “does not unlock the doors of discovery for a plaintiff armed with nothing more than conclusions.” *Iqbal*, 556 U.S. at 678–79.

1. Plaintiff Has Not Stated an ADA Claim Against ECFMG.

a. *Plaintiff’s Allegations Are Both False and Directed at the Wrong Entity.*

Reading Plaintiff’s Amended Complaint closely reveals that his ADA allegations relate to accommodations he sought from another entity, Prometric—not ECFMG. ECF 24-3, p. 1-2 of 8. However, Plaintiff argues that ECFMG is actually responsible for Prometric’s denial of Plaintiff’s request for an accommodation of his medical condition because ECFMG has failed to provide a written letter explaining that Plaintiff’s need to take his remaining test is immediate.

As an initial matter, Plaintiff’s allegations are demonstrably false. In response to Plaintiff’s request for a letter, ECFMG provided a letter informing Prometric of its Seven-Year Rule and that

Plaintiff has not satisfied such rule and asking Prometric to permit Plaintiff “to test as soon as possible.” *See* Exh. B.

Even assuming, however, that Plaintiff’s allegations regarding Prometric’s pre-accommodation requirements are true (which they are not), examination of them on their merit still results in their dismissal. Even according to Plaintiff himself, it is Prometric, another entity—and not ECFMG—who is receiving, analyzing, and ultimately denying Plaintiff’s request for a testing accommodation. Indeed, by Plaintiff’s own logic, if Prometric would have provided Plaintiff an ADA accommodation and allowed him to take the exam without a mask when he first asked, he might not have even needed an exception to ECFMG’s Seven-Year Rule at all. The truth remains that Plaintiff’s alleged ADA claim has been lodged at the wrong entity. And Plaintiff presents no legal authority supporting the proposition that one entity (here: ECFMG) can be liable for another entity’s (here: Prometric’s) refusal to accommodate his medical condition as required under the ADA. Consequently, Plaintiff’s ADA claim as to ECFMG should be dismissed.

b. Plaintiff’s ADA Claim Against ECFMG Fails as a Matter of Law.

Furthermore, to the extent that Plaintiff is lodging an ADA claim against ECFMG for its failure to provide him an accommodation under Title III for its refusal to provide Plaintiff an exception to its Seven-Year Rule prior to him taking his third and final test (*see* ECF 24-3, p. 5 of 8), such a claim fails as a matter of law. To state a claim under Title III, “a plaintiff must show ‘(1) discrimination on the basis of a disability; (2) in the full and equal enjoyment of the goods, services, facilities, privileges, advantages or accommodations of any place of public accommodation; (3) by the public accommodation’s owner, lessor or operator.’” *Anderson v. Macy’s, Inc.*, 943 F. Supp. 2d 531, 542-43 (W.D. Pa. 2013) (quoting *Harty v. Burlington Coat Factory of Pa., LLC*, Civ. A. No. 11-01923, 2011 U.S. Dist. LEXIS 64228, at *28 (E.D. Pa. June

16, 2011)).⁵ Title III’s definition of “discrimination” specifically includes the “failure to make reasonable modifications in policies . . . when such modifications are necessary to afford such goods, services, facilities, privileges, advantages, or accommodations to individuals with disabilities, unless . . . making such modifications would fundamentally alter the nature of such goods, services, facilities, privileges, advantages, or accommodations.” 42 U.S.C. § 12182(b)(2)(A)(ii).

The Third Circuit has consistently interpreted Title III to “plain[ly] mean []” that “a public accommodation is a place.” *Ford v. Schering-Plough Corp.*, 145 F.3d 601, 612 (3d Cir. 1998); *Peoples v. Discover Fin. Servs.*, 387 F. App’x 179, 183-84 (3d Cir. 2010). As such, Title III’s prohibitions do not apply to “an organization’s operations unconnected to any physical facility.” *Ford*, 145 F.3d at 613. Therefore, courts in the Third Circuit limit Title III claims for failure to accommodate to those related to access to (1) physical places or (2) services with a “nexus” to physical places. *Ford*, 145 F.3d at 613; *see, e.g., Mahoney v. Herr Foods, Inc.*, Civ. A. No. 19-5759, 2020 U.S. Dist. LEXIS 72333, at *6 (E.D. Pa. Apr. 24, 2020); *Nguyen v. New Release DVD, LLC*, Civ. A. No. 16-62962017, U.S. Dist. LEXIS 178237, at *12 (E.D. Pa. Oct. 26, 2017) (“Nevertheless, the plaintiff chose to sue defendants who do not own, lease, or operate the places of public accommodation.”); *Kortyna v. Lafayette College*, 47 F. Supp. 3d 225, 236-237 (E.D. Pa. 2014) (rejecting Title III claim regarding a modification of policies “which [was] divorced from access to place”); *Peoples v. Discover Fin. Servs.*, Civ. A. No. 08-2024, 2009 U.S. Dist. LEXIS 87174, at **7-8 (E.D. Pa. Sept. 22, 2009), *aff’d* 387 F. App’x 179 (3d Cir. 2010) (“Though its credit services can be used by cardmembers at a merchant’s place of accommodation, DFS itself

⁵ Although ECFMG disputes that Plaintiff can establish either of the latter two elements of a Title III claim, for the purposes of this motion only, ECFMG only discusses the inadequacy of the first element, which alone is sufficient for dismissal of Plaintiff’s claim.

does not own, lease or operate those locations. Because there is no connection here between the services offered by DFS and a physical place of accommodation, plaintiff's Title III claim must be dismissed.”).

Here, Plaintiff's ADA claims in the Amended Complaint that deal with ECFMG pertain only to ECFMG's alleged refusal to grant Plaintiff a preemptive, undefined exception to its Seven-Year Rule or to provide a letter to Prometric describing Plaintiff's need for an accommodation (which it already provided). Such allegations are not related to Plaintiff's access to a physical place or ECFMG's services with any nexus to a physical place. Indeed, none of Plaintiff's allegations require him to have accessed any of ECFMG's physical spaces. Rather, like the plaintiffs in *Nguyen* and *Peoples*, Plaintiff's alleged qualms with his access to a physical place rest with another entity (here: Prometric). Therefore, under well settled Third Circuit precedent, Plaintiff's ADA claims against ECFMG cannot stand and the Court should dismiss the Amended Complaint.

2. Plaintiff Has Not Stated an EEOA Claim Against ECFMG.

In the last paragraph of the narrative Amended Complaint, in a “side note,” Plaintiff alleges that ECFMG's failure to provide the provide the preemptive, open-ended extension to his seven-year window constitutes a violation of the Equal Educational Opportunities Act (“EEOA”). This claim should be dismissed.

The EEOA provides that “[n]o State shall deny equal educational opportunity to an individual on account of his race, color, sex, or national origin, by . . . the failure by an educational agency to take appropriate action to overcome language barriers that impede equal participation by its students in instructional programs.” 20 U.S.C. § 1703(f). “The EEOA defines ‘educational agency’ as both a local educational agency and a ‘state educational agency’”” *CG v. Pa. Dep’t of Educ.*, 888 F. Supp. 2d 534, 574 (M.D. Pa. 2012) (citing *Horne v. Flores*, 557 U.S. 433,

438 (2009); 20 U.S.C. § 1720(a)). A “state educational agency” is defined as “the agency primarily responsible for the State supervision of public elementary schools and secondary schools.” *Id.* (quoting 20 U.S.C. § 7801(41)). In Pennsylvania, the Pennsylvania Department of Education has retained this responsibility. *Id.* (citing *Hendricks v. Gilhool*, 709 F. Supp. 1362, 1368 (E.D. Pa. 1989)). A “local educational agency” is defined as “a public board of education or other public authority legally constituted within a State for either administrative control or direction of, or to perform a service function for, public elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a State” *Issa v. Sch. Dist. of Lancaster*, Civ. A. No. 16-3881, 2016 U.S. Dist. LEXIS 114546, at *3 n.1 (E.D. Pa. Aug. 26, 2016) (citing 20 U.S.C. § 1720(b); 20 U.S.C. § 7801(30)).

Here, ECFMG is neither a state educational agency nor a local education agency, as defined by the EEOA. Consequently, it cannot be held liable for claims arising under that statute, and the Court should dismiss Plaintiff’s Amended Complaint.

IV. CONCLUSION

For the foregoing reasons, ECFMG respectfully requests that that the Court grant its Motion to Dismiss Plaintiff’s Amended Complaint pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6). Plaintiff’s case is not ripe and the Amended Complaint does not state any claim upon which relief may be granted.

Moreover, because the defects in the Amended Complaint cannot be cured by amendment (as is evident by the Court already permitting Plaintiff to amend his Complaint), ECFMG asks that the dismissal be with prejudice. *See Grayson v. Mayview State Hosp.*, 293 F.3d 103, 108 (3d Cir. 2002).

Dated: October 1, 2021

Respectfully submitted,

/s/ Elisa P. McEnroe

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CERTIFICATE OF SERVICE

I do hereby certify that on this date, I caused true and correct copies of the foregoing document to be served via the ECF system and email upon:

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Plaintiff

DATED: October 1, 2021

/s/ Elisa P. McEnroe
Elisa P. McEnroe

EXHIBIT A



ECFMG®

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Information Booklet

ECFMG CERTIFICATION 2020



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About the ECFMG Information Booklet and Application Materials

The ECFMG *Information Booklet* contains detailed information on ECFMG's program of certification. The information contained in this booklet pertains only to the ECFMG certification process and related applications and services. This booklet should not be used as a guide to ECFMG's other programs and services, such as the Electronic Portfolio of International Credentials (EPICSM). Please visit the [ECFMG website](#) for information on ECFMG's programs and services. You also can access this publication, the Application for ECFMG Certification, and the application for Step 1 and Step 2 (Clinical Knowledge and Clinical Skills components) of the United States Medical Licensing Examination[®] (USMLE[®]) on the [ECFMG website](#).

Applicants for examination must use the applicable edition of the *Information Booklet*. The 2020 *Information Booklet* pertains to eligibility periods in 2020. If your eligibility period extends into 2021 and you test in 2021, you must become familiar with and will be subject to the policies and procedures detailed in the 2021 *Information Booklet*. The 2021 *Information Booklet* is expected to be available in September 2020. See the information on eligibility periods under [Applying for Examination](#) in *The United States Medical Licensing Examination (USMLE)* section of this booklet.

The [USMLE Bulletin of Information](#) provides information about the USMLE, a three-step examination for medical licensure in the United States. In the event that information about the USMLE in the ECFMG *Information Booklet* differs from the corresponding information in the USMLE *Bulletin of Information*, the information in the USMLE *Bulletin of Information* controls.

IMPORTANT

Applicants for examination are required to read and become familiar with the information contained in and referenced in both the ECFMG *Information Booklet* and the USMLE *Bulletin of Information*. The USMLE *Bulletin of Information* is available on the [USMLE website](#). Exam applicants should also carefully read the exam application [overview](#) and [instructions](#) available in ECFMG's Interactive Web Applications (IWA). Applicants should review and be familiar with the [Policies and Procedures Regarding Irregular Behavior](#).

Although current at the time of publication, the information contained in the 2020 *Information Booklet* is subject to change. If changes occur, information will be posted on the [ECFMG website](#). You must obtain the most recent information to understand current policies and procedures.

ECFMG provides important updates on ECFMG Certification and entry into graduate medical education in the United States via an e-mail newsletter called *The ECFMG[®] Reporter* and via Facebook and Twitter. ECFMG encourages applicants to [subscribe](#) to *The ECFMG[®] Reporter* and follow ECFMG on [Facebook](#) and [Twitter](#).

The *Information Booklet* describes deadlines related to exam applications, scheduling, and other services. Unless otherwise indicated, deadlines are calculated using Eastern Time in the United States.

Consistent with ECFMG's Privacy Notice, ECFMG may share the information contained in your application, or that otherwise may become available to ECFMG, with any federal, state or local governmental department or agency, with any hospital or with any other organization or individual who, in the judgment of ECFMG, has a legitimate interest in such information. This may include reporting determinations of irregular behavior to the USMLE Committee for Individualized Review, Federation of State Medical Boards of the United States, U.S. state and international medical licensing authorities, graduate medical education programs, and to any other organization or individual who, in the judgment of ECFMG, has a legitimate interest in such information. For further information regarding ECFMG's data collection and privacy practices, please refer to our [Privacy Notice](#).

ECFMG strives to ensure proper processing of applications for ECFMG Certification and examination, other service requests related to ECFMG Certification and examination, and the information contained in such applications and requests. In the unlikely event that an error occurs in the processing of applications, requests, or associated materials, ECFMG will make reasonable efforts to correct the error, if possible, or permit you either to reapply at no additional fee or to receive a refund. These are the

exclusive remedies available to applicants for errors in processing applications and other service requests related to ECFMG Certification, examination, and the other programs described in this booklet.

Please note that ECFMG will not provide services of any kind if doing so would be considered violative of any applicable international, federal, state, or local laws or regulations. Additionally, ECFMG may delay or suspend provision of services while investigating whether the services or surrounding circumstances violate such laws, regulations, or ECFMG's policies and procedures.

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ECFMG Certification

About ECFMG Certification | [Requirements for ECFMG Certification](#) | [Standard ECFMG Certificate](#)

About ECFMG Certification

The Educational Commission for Foreign Medical Graduates (ECFMG), through its program of certification, assesses whether international medical graduates are ready to enter residency or fellowship programs in the United States that are accredited by the [Accreditation Council for Graduate Medical Education \(ACGME\)](#). ACGME requires international medical graduates who enter ACGME-accredited programs to be certified by ECFMG.

ECFMG Certification assures directors of ACGME-accredited residency and fellowship programs, and the people of the United States, that international medical graduates have met minimum standards of eligibility to enter such programs. ECFMG Certification does not, however, guarantee that these graduates will be accepted into programs; the number of applicants each year exceeds the number of available positions.

ECFMG Certification is also one of the eligibility requirements for international medical graduates to take Step 3 of the three-step [United States Medical Licensing Examination \(USMLE\)](#). Medical licensing authorities in the United States require that international medical graduates be certified by ECFMG, among other requirements, to obtain an unrestricted license to practice medicine.

ECFMG defines an international medical graduate as a physician who received his/her basic medical degree from a medical school located outside the United States and Canada*. Citizens of the United States who have completed their medical education in schools outside the United States and Canada are considered international medical graduates; non-U.S. citizens who have graduated from medical schools in the United States and Canada are not considered international medical graduates.

* The United States and Canada refer to the geographic locations where citizens are issued passports by the governments of either the United States or Canada.

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ECFMG Certification

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Requirements for ECFMG Certification

To be eligible for certification by ECFMG, international medical graduates must meet the following requirements.

Medical School Requirements

The physician's medical school must meet requirements established by ECFMG. Schools that meet all requirements will be listed in the *World Directory of Medical Schools (World Directory)* as meeting eligibility requirements for their students and graduates to apply to ECFMG for ECFMG Certification and examination. To confirm that your medical school meets ECFMG's requirements, access the *World Directory* at www.wdoms.org. Medical schools that meet ECFMG's requirements will have an ECFMG note stating this in the schools' *World Directory* listing. The ECFMG note also will include the graduation years for which the school meets these requirements. Since ECFMG is a sponsor of the *World Directory*, the ECFMG note is located on the "Sponsor Notes" tab of the medical school listing. If there is no ECFMG note on the Sponsor Notes tab of your medical school's listing, you are not eligible to apply to ECFMG for ECFMG Certification and examination. For tips, see the quick guide on [how to confirm that a medical school meets eligibility requirements](#).

Important Note: Beginning in 2023, individuals will be eligible to apply for ECFMG Certification—the first step in the certification process—and take the required examinations if, at the time of application, their medical school is appropriately accredited. More specifically, the school must be accredited by an accrediting agency that is officially recognized by the World Federation for Medical Education (WFME) through its *Programme for Recognition of Accrediting Agencies*. Further details regarding the 2023 Medical School Accreditation Requirement, including eligibility guidelines, are available on the ECFMG website at www.ecfm.org/accreditation. International medical students and graduates interested in ECFMG Certification should monitor the ECFMG website for the latest information.

Application for ECFMG Certification

International medical students/graduates who wish to pursue ECFMG Certification must submit an Application for ECFMG Certification. The Application for ECFMG Certification consists of an on-line application and the Certification of Identification Form (Form 186) available through ECFMG's Interactive Web Applications (IWA). The Application for ECFMG Certification requires applicants to confirm their identity, contact information, and graduation from or enrollment in a medical school that is listed in the *World Directory* as meeting ECFMG eligibility requirements. See [Medical School Requirements](#). As part of the application, international medical students/graduates must also confirm their understanding of the purpose of ECFMG Certification and release certain legal claims. See [Application for ECFMG Certification](#).

Examination Requirements

The examination requirements for ECFMG Certification include passing Step 1 and Step 2 of the USMLE. The Step 2 exam has two separately administered components, the Clinical Knowledge (CK) component and the Clinical Skills (CS) component.

To meet the examination requirements for ECFMG Certification, applicants must:

1. Satisfy the medical science examination requirement.

Step 1 and Step 2 CK of the USMLE are the exams currently administered that satisfy this requirement.

2. Satisfy the clinical skills requirement.

Step 2 CS of the USMLE is the exam currently administered that satisfies this requirement.

ECFMG has established time limits for completing the examinations required for ECFMG Certification.

For detailed information, including information on time limits and using a passing performance on former exams to satisfy these requirements, see [Examinations for ECFMG Certification](#).

Medical Education Credential Requirements

The physician's graduation year must be included in the ECFMG note in the medical school's *World Directory* listing. See [Medical School Requirements](#). International medical graduates must have been awarded credit for at least four credit years (academic years for which credit has been given toward completion of the medical curriculum) by a medical school that is listed in the *World Directory* as meeting ECFMG eligibility requirements. There are restrictions on credits transferred to the medical school that awards an applicant's medical degree that can be used to meet this requirement. See [Transfer Credits](#) in *Medical Education Credentials*.

Applicants must document the completion of all requirements for, and receipt of, the **final medical diploma**. See the [Reference Guide for Medical Education Credentials](#) on the ECFMG website for the exact title of the final medical diploma you must have earned (and must provide). ECFMG verifies every applicant's medical school diploma with the appropriate officials of the medical school that issued the diploma and requests that the medical school provide the **final medical school transcript**. Verification by ECFMG with the issuing school may also be required for transcripts that are submitted to document transferred credits. See [Medical Education Credentials](#).

Important Note: Submitting falsified or altered documents may result in a finding of irregular behavior and permanent annotation of your ECFMG record. For more information and potential consequences, see [Policies and Procedures Regarding Irregular Behavior](#).

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ECFMG Certification

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Standard ECFMG Certificate

The Accreditation Council for Graduate Medical Education (ACGME) requires international medical graduates who enter ACGME-accredited programs of graduate medical education in the United States to be certified by ECFMG.

ECFMG issues the Standard ECFMG Certificate to applicants who meet all of the requirements for certification. International medical graduates must also pay any outstanding charges on their ECFMG financial accounts before their certificates are issued. Standard ECFMG Certificates are issued to applicants approximately two weeks after all of these requirements have been met. The date that the Standard ECFMG Certificate is issued is the date an international medical graduate is considered certified by ECFMG. Currently, ECFMG sends the Standard ECFMG Certificate to the applicant's address of record by Federal Express. For tips, see the quick guide on [how to ensure you receive your ECFMG Certificate](#) as soon as possible.

The Standard ECFMG Certificate includes:

- The name of the applicant;
- The certificate number;
- The dates that the examination requirements were met; and
- The date that the certificate was issued.

Confirming ECFMG Certification to Third Parties

ECFMG offers the Certification Verification Service (CVS) to provide primary-source confirmation of the ECFMG certification status of international medical graduates. ECFMG will confirm your certification status when a request is received from a U.S. medical licensing authority, residency program director, hospital, or other organization that, in the judgment of ECFMG, has a legitimate interest in such information. For status reports sent to medical licensing authorities, the request can also be made by you. For more information, see [Confirming ECFMG Certification to Third Parties](#) in *Related ECFMG Services*.

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Your ECFMG Record

USMLE/ECFMG Identification Number | [Your Name](#) | [Changing Your Name](#) | [Contact Information](#)

USMLE/ECFMG Identification Number

Before you can submit an Application for ECFMG Certification or apply to ECFMG for an exam, you must obtain a USMLE/ECFMG Identification Number. You can obtain a USMLE/ECFMG Identification Number by accessing [Interactive Web Applications \(IWA\)](#). Please allow approximately five business days to receive your Identification Number.

The information you provide during the process of obtaining a USMLE/ECFMG Identification Number will become a part of your permanent ECFMG record. If you fail to provide your name exactly as it appears on your current, unexpired passport, you will be required to submit acceptable documentation, as described in [Changing Your Name](#) in *Your ECFMG Record*, to change the name in your ECFMG record. If ECFMG determines that the biographic information you submit is inaccurate, not complete, or insufficient to assign a USMLE/ECFMG Identification Number to you, your request for the USMLE/ECFMG Identification Number will not be processed.

Once ECFMG informs you of your number, you must include it on all communications, applications, medical education credentials, request forms, and payments that you send to ECFMG. You will also need your USMLE/ECFMG Identification Number to use ECFMG's [on-line services](#).

You will only be assigned one USMLE/ECFMG Identification Number. Your USMLE/ECFMG Identification Number cannot be changed. Obtaining or attempting to obtain a USMLE/ECFMG Identification Number after one has been assigned to you may result in a finding of irregular behavior. If you forget or lose your USMLE/ECFMG Identification Number, you can obtain it by accessing [IWA](#) or by [contacting ECFMG](#). Use the contact information for General Inquiries on the Contact ECFMG page of the ECFMG website. To protect the privacy of applicants, ECFMG will not provide USMLE/ECFMG Identification Numbers by telephone.

Important Note: As part of the process of obtaining an Identification Number, you will be asked if you previously submitted an Application for ECFMG Certification and/or an application for examination to ECFMG. You also will be asked if you were previously assigned a USMLE Identification Number. If you were previously assigned a USMLE Identification Number or have submitted a prior application to ECFMG, you must answer “Yes” to the applicable question(s), even if you submitted the prior application under a different name or did not take the exam for which you applied. You must answer “Yes” regardless of whether you submitted an on-line application or a paper application. If you were previously assigned a USMLE Identification Number or have submitted an application to ECFMG but indicate that you were not previously assigned a number or have not applied previously, this may result in a finding of irregular behavior and permanent annotation of your ECFMG record. See [Policies and Procedures Regarding Irregular Behavior](#).

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Your ECFMG Record

[USMLE/ECFMG Identification Number](#) | Your Name | [Changing Your Name](#) | [Contact Information](#)

Your Name

You must ensure that the name in your ECFMG record matches your name exactly as it appears on your current, unexpired passport. This name will appear on your Standard ECFMG Certificate once you have met all requirements for certification. You must use this name consistently in all communications you send to ECFMG, including applications and requests for other services. Failure to use the name in your ECFMG record consistently in all communications with ECFMG may delay exam registration. It may also prevent you from taking an exam for which you are registered and scheduled.

You can check the name in your ECFMG record on-line using [OASIS](#) or the MyECFMG mobile app. If the name in your ECFMG record does not match your name exactly as it appears on your passport, you must submit acceptable documentation to ECFMG to change the name in your ECFMG record. See [Changing Your Name](#) in *Your ECFMG Record*.

- The name you submit on your exam **application** will appear on your exam **scheduling permit**. Your name, as it appears on your scheduling permit, must exactly match the name on the form(s) of **identification** you present at the test center. Please review your scheduling permit for details and limited exceptions. See information on required identification under [Taking the Examination](#) in *The United States Medical Licensing Examination (USMLE)*.

If the name on your **scheduling permit** has been misspelled, [contact ECFMG](#) immediately by e-mail, telephone, or fax. Use the contact information for General Inquiries on the Contact ECFMG page of the ECFMG website.

If you change the name in your ECFMG record while you are registered for an exam, a revised scheduling permit reflecting this change will be issued. ECFMG will send you an e-mail notification when your revised scheduling permit is available. You must present the revised scheduling permit at the test center on your exam date. Name changes must be received **and processed** by ECFMG no later than seven business days before your testing appointment, or you will not be able to test.

If you have a valid *Certification of Identification Form* (Form 186) on file with ECFMG, it will be invalidated when the name in your ECFMG record is changed, and you will be required to complete a new *Certification of Identification Form* (Form 186) before you may apply for examination.

- If the name on your **medical diploma, transcript, or other credential** does not match **exactly** the name in your **ECFMG record**, you must submit documentation, as described in [Verifying Your Name](#) in *Medical Education Credentials* that **verifies** the name on your medical diploma, transcript, or other credential is (or was) your name.

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Your ECFMG Record

[USMLE/ECFMG Identification Number](#) | [Your Name](#) | [Changing Your Name](#) | [Contact Information](#)

Changing Your Name

If the name in your ECFMG record does not match your name exactly as it appears on your current, unexpired passport and you want to request a **change** of name in your ECFMG record, send a completed [Request to Change Applicant Biographic Information \(Form 182\)](#) to ECFMG. Form 182 is available in the Resources section of the ECFMG website and from ECFMG, upon request. Form 182 requires you to provide a reason for the name change and must be accompanied by a copy of the appropriate document(s), as defined on Form 182. ECFMG must be able to determine from the document(s) you submit that your name has legally changed from the name currently in your ECFMG record to the name you are requesting to appear in your record and that you are using this new name consistently. This means that it may be necessary for you to submit more than one document to support your name change request. **For the purpose of changing your name, you must submit your current, unexpired passport (including the pages with your photograph and the expiration date).** If additional supporting documentation is required, examples of acceptable documentation include:

- Birth Certificate
- Marriage Certificate/License (if your name change is due to marriage)
- Official Court Order/Name Change Documentation
- Official Immigration Document, including
 - U.S. Resident Alien Card
 - U.S. Naturalization Certificate
 - Permanent Residence Card
- Driver's License

See additional information on documents in Important Notes below.

Important Notes: If you change the name in your ECFMG record while you are registered for an exam, a revised scheduling permit reflecting this change will be issued. ECFMG will send you an e-mail notification when your revised scheduling permit is available. You must present the revised scheduling permit at the test center on your exam date. Name changes must be received **and processed** by ECFMG no later than seven business days before your testing appointment, or you will not be able to test.

If you have a valid *Certification of Identification Form* (Form 186) on file with ECFMG, it will be invalidated when the name in your ECFMG record is changed, and you will be required to complete a new *Certification of Identification Form* (Form 186) before you may apply for examination.

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Your ECFMG Record

[USMLE/ECFMG Identification Number](#) | [Your Name](#) | [Changing Your Name](#) | [Contact Information](#)

Contact Information

The contact information in your ECFMG record consists of your e-mail address, your address of residence, your telephone number, and your fax number (if applicable). ECFMG will send information on the status of your applications by e-mail. You will also need an e-mail address to use ECFMG's [on-line services](#). Be sure to include a full and complete address for your residence. ECFMG will use your address of residence as your mailing address. Certain ECFMG correspondence, including your Standard ECFMG Certificate, requires a full mailing address.

You should ensure that the contact information in your ECFMG record is current. You can check and update your contact information on-line using [OASIS](#) or the [MyECFMG mobile app](#). You cannot submit changes to your contact information to ECFMG by e-mail. ECFMG will not process changes to contact information received from any person other than the applicant.

Changing your e-mail address using OASIS or MyECFMG does not update your e-mail address in your e-newsletter subscription(s). If you are subscribed to one or more of ECFMG's [e-mail newsletters](#), such as *The ECFMG® Reporter* or *ECHO News*, and your e-mail address changes, you must update your e-mail address for **each** e-newsletter. To update your e-mail address in your e-newsletter subscription(s), visit the E-Newsletters page in the Resources section of the ECFMG website, click on the newsletter(s) you receive, unsubscribe your old e-mail address, and subscribe your new e-mail address.

To protect the privacy of applicants, ECFMG will e-mail applicant-specific information only to the e-mail address in the applicant's ECFMG record. If your e-mail inquiry requires a specific response, you must send your inquiry from the e-mail address in your ECFMG record.

All correspondence with ECFMG, including e-mails, will become a part of your permanent ECFMG record.

For further information regarding ECFMG's data collection and privacy practices, please refer to our [Privacy Notice](#).

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Your ECFMG Financial Account

Fees | [Payment](#) | [Methods of Payment](#) | [Refunds](#) | [Forfeiture of Funds](#)

Fees

For a list of fees for ECFMG services that applicants encounter most frequently while pursuing ECFMG Certification and entry into U.S. programs of graduate medical education, see the [Fees](#) page on the ECFMG website. Other fees may apply. All fees are in U.S. dollars and are subject to change without notice.

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Your ECFMG Financial Account

[Fees](#) | [Payment](#) | [Methods of Payment](#) | [Refunds](#) | [Forfeiture of Funds](#)

Payment

Full payment is due at the time you submit an application or request a service. If your application/request is rejected, any payment received with that application/request will be credited to your ECFMG financial account.

Funds in an applicant's ECFMG financial account will be available for a period of two years to pay for applications/requests. Any funds not used during a two-year period will be forfeited to ECFMG; **this means that the applicant will lose those funds**. See [Forfeiture of Funds](#) in *Your ECFMG Financial Account*.

If you owe money to ECFMG at the time that your application/request is processed, ECFMG will apply the payment included with your application/request to the amount that you owe. Any money that is left after this will be used to pay for the application/request. If there is not enough money remaining to pay for the application/request, your application/request will be rejected.

If you submit a paper request and do not include payment, or if the payment you include is not sufficient to cover all fees, we will use the money in your ECFMG financial account to pay for the request. If the money in your account is not sufficient to cover all fees, your request will be rejected.

You can check the status of your ECFMG financial account and make on-line payments using [OASIS](#) or the [MyECFMG mobile app](#). ECFMG's on-line payment is secured using industry-standard encryption technology.

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Your ECFMG Financial Account

[Fees](#) | [Payment](#) | [Methods of Payment](#) | [Refunds](#) | [Forfeiture of Funds](#)

Methods of Payment

If you submit an application or request a service **on-line**, you can pay on-line at the time of application/request by:

- **Credit card** – To use this option, you must have a Visa, MasterCard, Discover, or American Express card with a security code.
- **Electronic check** – To use this option, you must have a checking account at a U.S. bank and either a U.S. Social Security Number or U.S. driver's license. Checks returned for insufficient funds will be subject to a \$10 processing fee and [Telecheck Returned Check Fees](#).

You can also pay in advance using one of the payment methods described above by accessing [OASIS](#) on the ECFMG website or using the MyECFMG mobile app.

You can also send payment in advance to ECFMG using [Payment for Service\(s\) Requested \(Form 900\)](#), available in the Resources section of the ECFMG website. If you submit payment using Form 900, you can pay by:

- **Credit card** – Visa, MasterCard, Discover, or American Express.
- **Check, bank draft, or money order** made payable to the Educational Commission for Foreign Medical Graduates (or ECFMG). All payments must be made in U.S. funds through a U.S. bank. **You must write your full name and USMLE/ECFMG Identification Number, if one has been assigned to you, on your payment.**

If you pay in advance, you should verify that the payment has been received and credited to your ECFMG financial account before you begin the application or request process. You can verify the status of your ECFMG financial account on-line using [OASIS](#) or the MyECFMG mobile app.

Important Note: If you need to make multiple credit card transactions to pay for an application/request, you must make these payments to your ECFMG financial account in advance using OASIS, the MyECFMG mobile app, or by submitting multiple copies of [Form 900](#).

Do **not** send payments in cash.

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Your ECFMG Financial Account

[Fees](#) | [Payment](#) | [Methods of Payment](#) | [Refunds](#) | [Forfeiture of Funds](#)

Refunds

If you have money in your ECFMG financial account, you may request a refund. Refund requests must be made in writing and should be sent via e-mail to finance@ecfm.org. If the money in your account was a payment for an exam application that was rejected (because you were not eligible or the application was incomplete or otherwise deficient), your refund will be subject to a \$100 processing fee. Approved refunds typically will be issued using the same method as the original payment. For example, if an applicant submits a payment using a credit card, then the refund will be made to the same card.

Important Note: You should consider carefully the timing of your exam application, eligibility period, and test date. Once registered, you cannot cancel or postpone your registration. If you do not schedule and take the exam, you will not receive a refund or credit of your exam fee(s), and you will be required to reapply, including payment of all applicable fees, if you wish to take the exam.

Although you cannot cancel or postpone your registration, there are options that provide registered applicants with flexibility. All registered applicants may change their scheduled test date and/or center, subject to availability. Applicants registered for Step 1/Step 2 CK may request extension of their eligibility periods. Applicants registered for Step 1/Step 2 CK also may request to change their testing region. See information on rescheduling under [Scheduling the Examination](#) in *The United States Medical Licensing Examination (USMLE)*. Applicants registered for Step 2 CS who are unable to obtain the appropriate visa to enter the United States to take the exam may request a full refund of the exam fee. Other requests for exceptions from Step 2 CS applicants are considered on a case-by-case basis. ECFMG will consider requests for exceptions only after the applicant's eligibility period has expired.

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Your ECFMG Financial Account

[Fees](#) | [Payment](#) | [Methods of Payment](#) | [Refunds](#) | Forfeiture of Funds

Forfeiture of Funds

Funds in an applicant's ECFMG financial account will be available for a period of two years to pay for applications submitted or services requested. Any funds not used during a two-year period will be forfeited to ECFMG; **this means that the applicant will lose those funds**. The two-year period is calculated from the date of last transactional activity in the account.

It is your responsibility to monitor the status of your ECFMG financial account. You can check the status of your account, including dates on which payments were made to your account, using [OASIS](#) or the MyECFMG mobile app. A refund request should be made to claim any funds that will not be used prior to the expiration of the two-year period. See [Refunds](#) in *Your ECFMG Financial Account*.

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Irregular Behavior

Policies and Procedures Regarding Irregular Behavior

A. Policies Regarding Irregular Behavior

1. *Irregular behavior* includes all actions or attempted actions on the part of applicants, examinees, potential applicants, others when solicited by an applicant and/or examinee, or any other person that would or could subvert the examination, certification or other processes, programs, or services of ECFMG, including, but not limited to, the ECFMG Exchange Visitor Sponsorship Program, ECFMG International Credentials Services (EICS), the Electronic Portfolio of International Credentials (EPIC), and Electronic Residency Application Service (ERAS) Support Services at ECFMG. Such actions or attempted actions are considered irregular behavior, regardless of when the irregular behavior occurs, and regardless of whether the individual is certified by ECFMG. Examples of irregular behavior include, but are not limited to, submission of any falsified or altered document to ECFMG, whether submitted by the individual or by a third party, such as a medical school, on behalf of the individual; failing to comply with United States Medical Licensing Examination® (USMLE®) or ECFMG policies, procedures, and/or rules; falsification of information on applications, submissions, or other materials to ECFMG; taking an examination when not eligible to do so, or submission of any falsified or altered ECFMG document to other entities or individuals.

2. The Medical Education Credentials Committee's determination of irregular behavior is sufficient cause for ECFMG to bar an individual from future examinations, to bar an individual from other ECFMG programs and services, to withhold and/or invalidate the results of an examination, to withhold an ECFMG Certificate, to revoke an ECFMG Certificate, or to take other appropriate actions for a specified period of time or permanently. ECFMG may report the Medical Education Credentials Committee's determination of irregular behavior to the USMLE Committee for Individualized Review, Federation of State Medical Boards of the United States, U.S. state and international medical licensing authorities, graduate medical education programs, and to any other organization or individual who, in the judgment of ECFMG, has a legitimate interest in such information.

3. If the Medical Education Credentials Committee determines that an individual engaged in irregular behavior, a permanent annotation to that effect will be included in the individual's ECFMG record. This annotation will appear on the ECFMG Certification Verification Service (CVS) and ECFMG Status Reports for the individual. If the individual has an EPIC Portfolio, a permanent annotation will be included on all EPIC Reports with respect to that individual. Additional information explaining the basis for the determination of irregular behavior and the resulting action(s) will accompany every ECFMG Status Report, CVS Report, and EPIC Report, and may also be provided to legitimately-interested entities; this additional information may be provided, regardless of the date of the conduct or activity that comprises the irregular behavior. Notice of the Medical Education Credentials Committee's determination of irregular behavior is periodically reported to the ECFMG Board of Trustees.

B. Procedures Regarding Irregular Behavior

1. After receipt of a report or other information suggesting irregular behavior on the part of an individual, ECFMG staff will review the information and will assess whether there is sufficient evidence of irregular behavior. When indicated and feasible, staff will conduct a follow-up investigation to gather additional information.

2. If the individual is an examinee and the review referenced above will not be concluded until after the typical period for the reporting of exam scores, the examinee will be notified that the reporting of the exam scores in question is being delayed.

3. If ECFMG staff finds that there exists a reasonable basis to conclude that an individual may have engaged in irregular behavior, the matter will be referred to the Medical Education Credentials Committee. ECFMG may withhold services from the individual pending a determination from the Medical Education Credentials Committee. If the individual is an examinee, the examinee's exam scores will be withheld, if not already released, and the examinee may not be permitted to sit for subsequent examinations, nor will applications for examination be processed.

4. Using the individual's last known address, the individual will be advised in writing of the nature of the alleged irregular behavior and will be provided with a copy of the *Policies and Procedures Regarding Irregular Behavior*. If the alleged irregular behavior is related to a shared ECFMG and USMLE policy, the USMLE Program will also be advised of the allegation. The individual will be given an opportunity to provide written explanation and to present other relevant information. Any such written explanation or other relevant information must be received by ECFMG by the deadline set forth in ECFMG's writing to the individual. Submissions received after the deadline will be considered by the Medical Education Credentials Committee at its discretion. The individual may also request the opportunity to appear personally before the Medical Education Credentials Committee, and may be represented by legal counsel, if the individual so wishes. In instances in which the individual appears personally before the Medical Education Credentials Committee, a stenographic or audio recording will be made of that portion of the proceedings during which the individual is in attendance. Any statements made by the individual during a personal appearance before the Medical Education Credentials Committee will be under oath.

5. Individuals who have been charged with irregular behavior who wish to request a deferral of the ECFMG Committee's review of the allegation must (1) submit the request in writing and (2) provide the reason for the request. If ECFMG staff determine that the granting of the request could have a material impact on the individual's opportunity to refute the allegation then staff, at its discretion, can grant the request and defer an ECFMG action for up to six (6) months. Unless the individual can demonstrate compelling circumstances, ECFMG staff should not grant more than two deferral requests. Notwithstanding the foregoing, if the individual charged with irregular behavior is ECFMG Certified, a candidate for residency, or practicing medicine, ECFMG staff will only grant the request for deferral if, in its sole discretion, ECFMG believes that public health and safety is not at risk. If the deferral request is granted, ECFMG will notify appropriate institutions and authorities of the individual's pending irregular behavior charge.

6. All pertinent information regarding the irregular behavior, including any explanation or other information that the individual may provide, will be provided to the Medical Education Credentials Committee. The Medical Education Credentials Committee, based on the information available to it, will determine whether the preponderance of the evidence indicates that the individual engaged in irregular behavior. If the Medical Education Credentials Committee determines that the individual engaged in irregular behavior, the Medical Education Credentials Committee will determine what action(s) will be taken as a result of the irregular behavior. ECFMG will notify the individual whether the Medical Education Credentials Committee determined the individual engaged in irregular behavior and of any action(s) taken pursuant thereto.

7. The Medical Education Credentials Committee's determination of irregular behavior and any action(s) taken pursuant thereto (a "decision" of the Medical Education Credentials Committee) may be appealed to the Review Committee for Appeals if the individual has a reasonable basis to believe the Medical Education Credentials Committee did not act in compliance with the Medical Education Credentials Committee Policies and Procedures or that the Medical Education Credentials Committee's decision was clearly contrary to the weight of the evidence before it. The notice of appeal must be received by ECFMG within thirty (30) days of the date on which the notification advising the individual of the Medical Education Credentials Committee's decision was mailed to the individual. The appeal of a decision of the Medical Education Credentials Committee is governed by the Rules of Appellate Procedure.

8. Petitions for reconsideration of a decision of the Medical Education Credentials Committee will be reviewed by the Medical Education Credentials Committee only in extraordinary cases. Any such petition must first be considered by ECFMG staff, who, after discussion with the Medical Education Credentials Committee Chair, may deny the request or place it on the agenda for consideration by the full Medical Education Credentials Committee at a regularly scheduled meeting. Absent the submission of newly discovered material evidence not previously available to the petitioner and, therefore, not available to the Medical Education Credentials Committee, petitions for reconsideration typically will be denied.

C. Representative Examples of Irregular Behavior

Representative examples of allegations of irregular behavior and actions taken by the ECFMG Medical Education Credentials Committee include, but are not limited to, the following:

- **Providing false information on an application submitted to ECFMG**

The ECFMG Medical Education Credentials Committee reviewed an allegation of irregular behavior in connection with an individual who provided false information on an application submitted to ECFMG as part of the certification process. In that application, the individual certified he was a student enrolled in medical school when, in fact, he previously had been dismissed from medical school and, therefore, was no longer a student.

Following review, the ECFMG Medical Education Credentials Committee determined the individual had engaged in irregular behavior and **took action to bar the individual from ECFMG Certification, thereby rendering the individual ineligible to apply for USMLE examinations leading to ECFMG Certification. A permanent annotation was added to the individual's ECFMG record.**

- **Providing false information to ECFMG as part of the ECFMG On-line Authentication Process, which is a prerequisite to submitting an application for examination**

The ECFMG Medical Education Credentials Committee reviewed an allegation of irregular behavior in connection with an individual who provided false information to ECFMG as part of the ECFMG On-line Authentication Process, which is used to obtain a USMLE/ECFMG Identification Number and is a prerequisite to submitting an application for examination. During the on-line authentication process, the individual certified he had not previously submitted an application for examination to ECFMG when he had not only previously applied for, but had taken examinations.

Following review, the ECFMG Medical Education Credentials Committee determined the individual had engaged in irregular behavior and **took action to bar the individual from ECFMG Certification, thereby rendering the individual ineligible to apply for USMLE examinations leading to ECFMG Certification. A permanent annotation was added to the individual's ECFMG record.**

- **Submitting a fraudulent medical diploma and providing false information on an application submitted to ECFMG**

The ECFMG Medical Education Credentials Committee reviewed an allegation of irregular behavior in connection with an individual who submitted a fraudulent medical diploma and provided false information on an application submitted to ECFMG.

Following review, the ECFMG Medical Education Credentials Committee determined the individual had engaged in irregular behavior and **took action to bar the individual from ECFMG Certification, thereby rendering the individual ineligible to apply for USMLE examinations leading to ECFMG Certification. A permanent annotation was added to the individual's ECFMG record.**

- **Submitting a falsified medical school transcript and providing false information to ECFMG**

The ECFMG Medical Education Credentials Committee reviewed an allegation of irregular behavior in connection with an authorized medical school official who submitted a fraudulent medical school transcript and provided false information to ECFMG.

Following review, the ECFMG Medical Education Credentials Committee determined the authorized medical school official had engaged in irregular behavior and **determined that ECFMG will not accept any documents signed and/or certified by the medical school official for ECFMG on behalf of the medical school, or any other medical school, for a minimum of five years. A permanent annotation was added to the medical school official's ECFMG record.**

Application for ECFMG Certification

To be eligible for ECFMG Certification, you must complete an Application for ECFMG Certification. The Application for ECFMG Certification consists of an on-line application available through ECFMG's Interactive Web Applications (IWA) and the Certification of Identification Form (Form 186) that must be completed and notarized via NotaryCam. Instructions on how to complete Form 186 using NotaryCam are included with the form. You must have your [USMLE/ECFMG Identification Number](#) before you can begin the Application for ECFMG Certification. For the current fee for submitting an Application for ECFMG Certification, see the [Fees](#) page of the ECFMG website.

As part of the Application for ECFMG Certification, you will be asked to confirm the name, date of birth, and gender in your ECFMG record. If this information does not match exactly the information on your current, unexpired passport, you must have the information in your ECFMG record changed to reflect the information as it appears on your passport before you can complete the Application for ECFMG Certification. Instructions for how to correct this information will be provided at the time of application.

If you are a medical school **student**, you will be asked to confirm that you are officially enrolled in a medical school located outside the United States and Canada that is listed in the [World Directory](#) as meeting ECFMG eligibility requirements, and that the "Graduation Years" in the ECFMG note in your medical school's *World Directory* listing are listed as "Current." If you are a medical school **graduate**, you will be asked to confirm that you are a graduate of a medical school located outside the United States and Canada that is listed in the *World Directory* as meeting ECFMG eligibility requirements, and that your graduation year is included in the ECFMG note in your school's *World Directory* listing. See [Medical School Requirements](#).

The Application for ECFMG Certification also will require you to confirm your understanding of the purpose of ECFMG Certification and release certain legal claims.

The information submitted in your Application for ECFMG Certification will become a part of your permanent ECFMG record.

An Application for ECFMG Certification will not be considered complete until ECFMG receives and processes both the on-line part of the application and the notarized Form 186 from NotaryCam. A notification will be sent to the e-mail address in your ECFMG record confirming receipt of the on-line part of your Application for ECFMG Certification. Once your Application for ECFMG Certification, including Form 186, has been accepted by ECFMG, it typically remains valid throughout the certification process. If you are a student when you submit your Application for ECFMG Certification, you do not need to submit another one when you graduate. You can use [OASIS](#) or the MyECFMG mobile app to confirm that you have submitted an Application for ECFMG Certification and have a valid Form 186 on file.

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Examinations for ECFMG Certification

Examination Requirements | [Time Limit for Completing Examination Requirements](#)

Examination Requirements

To be eligible for ECFMG Certification, you must satisfy both the medical science examination and clinical skills requirements. To satisfy these requirements, you must pass Step 1 and Step 2 of the United States Medical Licensing Examination (USMLE). Step 2 of the USMLE has two separately administered components, the Clinical Knowledge (CK) component and the Clinical Skills (CS) component. Refer to the [USMLE Bulletin of Information](#) for more information. ECFMG has established time limits for completing the examination requirements for ECFMG Certification. See [Time Limit for Completing Examination Requirements](#) in *Examinations for ECFMG Certification*.

Passing performance on certain formerly administered examinations can be used to meet these requirements as described below.

Medical Science Examination Requirement

Step 1 and Step 2 CK of the USMLE are the exams currently administered that satisfy the medical science examination requirement. There are time limits for completing these examinations for ECFMG Certification. See [Time Limit for Completing Examination Requirements](#) in *Examinations for ECFMG Certification*.

ECFMG also accepts a passing performance on the following **former** examinations to satisfy the medical science examination requirement for ECFMG Certification: ECFMG Examination, Visa Qualifying Examination (VQE), Foreign Medical Graduate Examination in the Medical Sciences (FMGEMS), and the Part I and Part II Examinations of the National Board of Medical Examiners (NBME).

Combinations of exams are also acceptable. Specifically, if you have passed only part of the former VQE, FMGEMS, or the NBME Part I or Part II, you may combine a passing performance on the basic medical science component of one of these exams or USMLE Step 1 with a passing performance on the clinical science component of one of the other exams or USMLE Step 2 CK, provided that the components are passed within the period specified for the exam program.

Additionally, ECFMG accepts a score of 75 or higher on each of the three days of a single administration of the former Federation Licensing Examination (FLEX), if taken prior to June 1985, to satisfy this requirement.

Clinical Skills Requirement

Step 2 CS of the USMLE is the exam currently administered that satisfies the clinical skills requirement. There are time limits for completing this examination for ECFMG Certification. See [Time Limit for Completing Examination Requirements](#) in *Examinations for ECFMG Certification*.

International medical students/graduates who have **both** passed the former ECFMG Clinical Skills Assessment (CSA®) **and** achieved a score acceptable to ECFMG on an English language proficiency test (such as the TOEFL exam or the former ECFMG English Test) can use these passing performances to satisfy the clinical skills requirement for ECFMG Certification.

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Examinations for ECFMG Certification

[Examination Requirements](#) | Time Limit for Completing Examination Requirements

Time Limit for Completing Examination Requirements

ECFMG policy requires that international medical students/graduates pass the USMLE Steps and Step Components required for ECFMG Certification within a seven-year period. This means that once you pass a Step or Step Component, you will have seven years to pass all of the other Step(s) or Step Component(s) required for ECFMG Certification. This seven-year period begins on the exam date of the first Step or Step Component passed and ends **exactly seven years from that exam date**.

If you do not pass all required Steps and Step Components within a maximum of seven years, your earliest USMLE passing performance will no longer be valid for ECFMG Certification. **It is your responsibility to track your progress toward meeting the exam requirements for ECFMG Certification. ECFMG will not notify you of upcoming deadlines to meet the seven-year requirement and will not notify you if one (or more) of your passing performances becomes invalid for ECFMG Certification because you failed to meet the seven-year requirement.**

Example: An international medical graduate took Step 1 on October 1, 2013 and passed. He has through October 1, 2020 to take and pass Step 2 CK and Step 2 CS, satisfying the remaining exam requirements for ECFMG Certification. If he does not take and pass Step 2 CK and Step 2 CS on or before October 1, 2020, his passing performance on Step 1 would no longer be valid for ECFMG Certification.

Under this policy, more than one USMLE passing performance can become invalid for ECFMG Certification.

Example: An international medical graduate passed Step 1 on April 1, 2012, and passed Step 2 CK on May 1, 2013. She had through April 1, 2019 (seven years from her Step 1 passing performance) to pass Step 2 CS, satisfying the remaining exam requirements for ECFMG Certification. She did not pass Step 2 CS by April 1, 2019, so her passing performance on Step 1 is no longer valid for ECFMG Certification. Her earliest USMLE passing performance that is valid for ECFMG Certification is now the Step 2 CK passing performance on May 1, 2013. She now has through May 1, 2020 (seven years from her Step 2 CK passing performance) to pass Step 1 and Step 2 CS, satisfying the remaining exam requirements for ECFMG Certification. If she does not pass Step 1 and Step 2 CS by May 1, 2020, her passing performance on Step 2 CK will no longer be valid for ECFMG Certification.

There are exceptions to this policy:

- This seven-year limit does **not** apply to the former ECFMG CSA because the CSA was not a USMLE Step or Step Component. International medical students/graduates who satisfied the clinical skills requirement for ECFMG Certification by passing the CSA are required to pass only Step 1 and Step 2 CK within seven years of each other for ECFMG Certification. For these individuals, the seven-year period begins on the exam date of the first USMLE Step or Step Component passed, regardless of when the CSA was passed.
- If your earliest USMLE passing performance that is valid for ECFMG Certification took place before June 14, 2004, you are required to pass only Step 1 and Step 2 CK within seven years of each other for ECFMG Certification; if required for ECFMG Certification, Step 2 CS can be passed outside the seven-year period.

If you have passed a Step or Step Component but this passing performance is no longer valid for ECFMG Certification, you may request an exception to retake the previously passed exam that is no longer valid. The USMLE program limits to six the total number of times an examinee can take the same Step or Step Component. See [Reexamination and Reapplication](#) in *The United States Medical Licensing Examination (USMLE)*.

Important Notes: Time limits to complete the USMLE for the purpose of U.S. medical licensure are established by state medical licensing authorities and may require completion of all Steps or Step Components (including Step 3, which is not required for ECFMG Certification) within a certain number of

years. Information regarding specific state requirements can be obtained on the [Federation of State Medical Boards website](#).

Applicants who retake a previously passed Step or Step Component to comply with a time limit should understand the implications of a failing retake performance on their Step 3 eligibility. See *Retaking Previously Passed Steps* in the [USMLE Bulletin of Information](#).

A passing performance that is no longer valid for ECFMG Certification will still appear on a USMLE transcript.

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Eligibility for Examination

Medical School Students | [Medical School Graduates](#) | [Reverification of Eligibility](#)

The eligibility requirements for examination differ depending on whether you are a medical school **student** or a medical school **graduate**.

Medical School Students

To be eligible for Step 1, Step 2 CK, and Step 2 CS, you must be officially enrolled in a medical school located outside the United States and Canada that is listed in the [World Directory](#) as meeting ECFMG eligibility requirements, both at the time that you apply for examination and on your test day. In addition, the “Graduation Years” in the ECFMG note in your medical school's *World Directory* listing must be “Current” at the time you apply and on your test day. See [Medical School Requirements](#). An authorized official of your medical school must certify your current enrollment status; instructions will be provided at the time of application for examination.

As soon as you graduate and receive your medical diploma, you must submit a copy of your medical diploma to ECFMG. See [Final Medical Diploma and Transcript](#) in *Medical Education Credentials*.

In addition to being currently enrolled as described above, to be eligible for Step 1, Step 2 CK, and Step 2 CS, you must have completed at least two years of medical school. This eligibility requirement means that you must have completed the basic medical science component of the medical school curriculum by the beginning of your eligibility period. Although you may apply for and take the examinations after completing the basic medical science component of your medical school curriculum, it is recommended that you complete your core clinical clerkships, including actual patient contact, before taking Step 2 CK and Step 2 CS.

If you have passed the former ECFMG CSA, you are **not** eligible to take Step 2 CS, except under certain, well-defined circumstances. Eligible circumstances include: taking Step 2 CS to permanently validate an expired CSA examination date for the purpose of entering U.S. GME; taking Step 2 CS because your most recent performance on a clinical skills exam (CSA or Step 2 CS) is a failing performance (See *Retaking Previously Passed Steps* in the [USMLE Bulletin of Information](#)); and retaking Step 2 CS to meet a time limit (See [Reexamination and Reapplication](#) in *The United States Medical Licensing Examination (USMLE)*).

Important Notes: If your eligibility for an exam changes after you apply but before you take the exam, you are required to inform ECFMG immediately in writing of this change in your status. Such notification must be sent to ECFMG's Applicant Information Services. Use the contact information for General Inquiries on the [Contact ECFMG](#) page of the ECFMG website. Such changes in your eligibility status include, but are not limited to, the following:

- Medical school students who transfer to another medical school after submitting an application for examination must inform ECFMG immediately in writing of this transfer.
- Medical school students who have been dismissed or withdraw(n) from medical school are not eligible for USMLE, even if they are appealing the school's decision to dismiss them or are otherwise contesting their status. Medical school students who have been dismissed or withdraw(n) from medical school must inform ECFMG immediately in writing of their dismissal or withdrawal.
- Medical school students who take a leave of absence should consult with their medical schools about whether they will be considered officially enrolled in medical school during leave. Your medical school may consider a student on leave of absence to be withdrawn from medical school. Medical school students who are not officially enrolled in medical school are not eligible to apply for or take USMLE. Applicants who take a leave of absence after submitting an application for examination to ECFMG must inform ECFMG immediately in writing of this leave.

Failure to inform ECFMG that you may no longer be eligible to take the examination may result in a finding of irregular behavior and permanent annotation of your ECFMG record. See [Policies and Procedures Regarding Irregular Behavior](#).

If you take a Step or Step Component for which you are not eligible, results for that exam may not be reported or, if previously reported, may be canceled.

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Eligibility for Examination

[Medical School Students](#) | [Medical School Graduates](#) | [Reverification of Eligibility](#)

The eligibility requirements for examination differ depending on whether you are a medical school **student** or a medical school **graduate**.

Medical School Graduates

To be eligible for Step 1, Step 2 CK, and Step 2 CS, you must be a graduate of a medical school located outside the United States and Canada that is listed in the [World Directory](#) as meeting ECFMG eligibility requirements. Your graduation year must be included in the "Graduation Years" listed in the ECFMG note in your medical school's *World Directory* listing. See [Medical School Requirements](#). You must have been awarded credit for at least four credit years (academic years for which credit has been given toward completion of the medical curriculum) by a medical school that is listed in the *World Directory* as meeting ECFMG eligibility requirements. An authorized official of your medical school must certify your status as a graduate of the school; instructions will be provided at the time of application for examination.

You must submit a copy of your medical diploma at the time of exam application if your diploma has not been sent to ECFMG previously. The exact degree title of the final medical diploma you must have earned (and must provide) in order to be eligible for ECFMG Certification and the examinations required for Certification is listed in the [Reference Guide for Medical Education Credentials](#) on the ECFMG website. If you have graduated and met all requirements for your medical diploma but your medical diploma has not yet been issued, a letter signed by an authorized official of your medical school must be submitted with your exam application. The letter you submit must be the original document and must be written on your medical school's letterhead. The letter must include the following statement:

This is to confirm that [applicant name] has graduated and completed all requirements to receive the [degree title] degree from [medical school/university name]. The degree will be issued [month and year].

You must then submit a copy of your medical diploma to ECFMG as soon as your diploma is issued. See [Medical Education Credentials](#).

All documents that are not in English must be accompanied by an official English translation that meets ECFMG's translation requirements. See [English Translations](#) in *Medical Education Credentials*.

If you have passed the former ECFMG CSA, you are **not** eligible to take Step 2 CS, except under certain, well-defined circumstances. Eligible circumstances include: taking Step 2 CS to permanently validate an expired CSA examination date for the purpose of entering U.S. GME; taking Step 2 CS because your most recent performance on a clinical skills exam (CSA or Step 2 CS) is a failing performance (See *Retaking Previously Passed Steps* in the [USMLE Bulletin of Information](#)); and retaking Step 2 CS to meet a time limit (See [Reexamination and Reapplication](#) in *The United States Medical Licensing Examination (USMLE)*).

Important Notes: If your eligibility for an exam changes after you apply but before you take the exam, you are required to inform ECFMG immediately in writing of this change in your status. Such notification must be sent to ECFMG's Applicant Information Services. Use the contact information for General Inquiries on the [Contact ECFMG](#) page of the ECFMG website. **Failure to inform ECFMG that you may no longer be eligible to take the examination may result in a finding of irregular behavior and permanent annotation of your ECFMG record.** See [Policies and Procedures Regarding Irregular Behavior](#).

If you take a Step or Step Component for which you are not eligible, results for that exam may not be reported or, if previously reported, may be canceled.

If you have already been granted a physician license by a U.S. medical licensing authority based on other licensure examinations, such as the Federation Licensing Examination (FLEX), the NBME certifying examinations, or the National Board of Osteopathic Medical Examiners COMLEX-USA, you

may not be eligible to take the USMLE. Please contact ECFMG if you have questions about your eligibility.

The American Medical Association's Council on Medical Education no longer supports the Fifth Pathway as a mechanism for eligibility to enter ACGME-accredited graduate medical education programs. Additionally, the USMLE Program no longer accepts Fifth Pathway Certificates to meet eligibility requirements to take Step 3. Individuals who hold Fifth Pathway Certificates and wish to apply to ECFMG for examination must apply for ECFMG Certification and meet the requirements for ECFMG Certification established for all medical school graduates.

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Eligibility for Examination

[Medical School Students](#) | [Medical School Graduates](#) | Reverification of Eligibility

Reverification of Eligibility

ECFMG reserves the right to reverify your eligibility for examination at any time during the application and registration process. If your medical school informs ECFMG that your status has changed, and ECFMG determines you are no longer eligible for examination, your registration will be canceled. **If you have failed to inform ECFMG of this change in your status, it may result in a finding of irregular behavior and permanent annotation of your ECFMG record. See [Policies and Procedures Regarding Irregular Behavior](#).**

For medical school students, ECFMG may reverify your status as a student officially enrolled in medical school. When a medical school does not participate in [ECFMG Medical School Web Portal \(EMSWP\)](#), Status Verification, ECFMG's reverification of the status of the school's students may include ECFMG sending a written request for reverification by postal mail to the medical school. If reverification is requested by ECFMG, ECFMG may cancel your registration or withhold your score report until ECFMG has received reverification of your status directly from the medical school. If your registration is canceled, you may be required to reapply.

For medical school graduates, ECFMG may reverify your medical education credentials with the issuing medical school. If such reverification is requested by ECFMG, you will be registered for examination only after ECFMG has received reverification of your credentials directly from the medical school. If reverification is requested by ECFMG after you have been registered for examination, ECFMG may cancel your registration or withhold your score report until ECFMG has received reverification of your medical education credentials directly from the issuing school. If your registration is canceled, you may be required to reapply.

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About USMLE

The USMLE is a three-step examination for medical licensure in the United States. The USMLE provides a common system to evaluate applicants for medical licensure. The USMLE is sponsored by the [Federation of State Medical Boards \(FSMB\)](#) and the [National Board of Medical Examiners \(NBME\)](#). The USMLE is governed by a committee consisting of representatives of FSMB, NBME, ECFMG, and the American public. If you apply for examination, you are **required** to read the [USMLE Bulletin of Information](#) for detailed information on the USMLE.

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Registration and Test Delivery Entities

Step 1 and Step 2

ECFMG is the organization that registers international medical students/graduates for Step 1 and Step 2 (CK and CS). This means that ECFMG processes your exam application and payment, verifies your eligibility, and notifies you of the outcome of your application. The NBME serves as the registration entity for students/graduates of U.S. and Canadian medical school programs accredited by the [Liaison Committee on Medical Education \(LCME\)](#), and U.S. medical schools accredited by the [American Osteopathic Association \(AOA\)](#).

For eligible international medical students/graduates applying for Step 1/Step 2 CK, ECFMG forwards registration information to NBME, and NBME issues the exam scheduling permits. ECFMG sends an e-mail notification to these applicants when their scheduling permits are available. Scheduling and test centers for USMLE Step 1 and Step 2 CK are provided by [Prometric](#). Prometric serves as the test delivery entity for all examinees taking Step 1/Step 2 CK. Step 1 and Step 2 CK are delivered at Prometric test centers worldwide.

For eligible international medical students/graduates applying for Step 2 CS, ECFMG issues the exam scheduling permits and sends an e-mail notification to applicants when the scheduling permits are available. The Clinical Skills Evaluation Collaboration (CSEC), a collaboration of ECFMG and NBME, is responsible for delivery of the Step 2 CS exam. Step 2 CS is delivered to all examinees at regional CSEC Centers in the United States.

For all applicants, NBME is responsible for determining the results of USMLE exams and for issuing the score reports. ECFMG sends an e-mail notification to international medical students/graduates when their Step 1, Step 2 CK, and Step 2 CS score reports are available.

Step 3

The FSMB is the organization that registers all Step 3 applicants. To be eligible for Step 3, international medical graduates must have passed Step 1 and Step 2 (CK and CS) and must be certified by ECFMG, among other requirements. See *Eligibility for the USMLE* in the [USMLE Bulletin of Information](#). If you have not met all eligibility requirements, your application for Step 3 will not be accepted. For detailed information and application procedures for Step 3, contact the [FSMB](#). Scheduling and test centers for Step 3 are provided by [Prometric](#), which serves as the test delivery entity for all Step 3 examinees. USMLE Step 3 is delivered at Prometric test centers in the United States.

For all applicants, NBME is responsible for determining the results of USMLE exams and for issuing the score reports. FSMB notifies examinees when their Step 3 score reports are available.

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Applying for Examination

Before applying to ECFMG for examination:

- International medical students/graduates must complete an Application for ECFMG Certification, including the notarized Certification of Identification Form (Form 186). See [Application for ECFMG Certification](#).
- ECFMG must accept the Application for ECFMG Certification, including the notarized Form 186.
- International medical students/graduates must read the applicable editions of the [ECFMG Information Booklet](#) and the [USMLE Bulletin of Information](#).

To apply for USMLE Step 1, Step 2 CK, and/or Step 2 CS, use ECFMG's [Interactive Web Applications \(IWA\)](#). A complete application consists of the on-line part, which you complete using IWA; verification of your student or graduate status by your medical school; and any other required documents. You should read the detailed [overview](#) and [instructions](#) that accompany the application for examination in IWA before you begin working on the application; these resources will help you plan the timing of your application and outline any necessary items (such as official signatures) that require advance planning.

Important Note: You should also consider deadlines imposed by the [National Resident Matching Program \(NRMP\)](#) and graduate medical education (GME) programs. It is solely the responsibility of the applicant to complete the required exams in time to meet deadlines imposed by the NRMP and/or GME programs. Since the number of applicants seeking to complete these exams may exceed the spaces available in time to meet those deadlines, there is no guarantee that sufficient spaces will be available for all applicants to meet deadlines imposed by the NRMP and/or GME programs. ECFMG assumes no liability of any kind if an applicant does not complete the exams in time to have results available to meet NRMP and/or GME program deadlines. See [Examination Results](#) for information on scoring turnaround times.

Exam Fees

For all exams, there is an examination fee. For Step 1 or Step 2 CK, there is an additional international test delivery surcharge, if you choose a testing region other than the United States/Canada. You must pay all applicable fees at the time you apply for examination. For the current exam fees and international test delivery surcharges, see the [Fees](#) page on the ECFMG website.

Eligibility Periods

When you apply for Step 1 or Step 2 CK, you must select a three-month eligibility period, such as January-February-March, February-March-April, etc., during which you would prefer to take the exam. The eligibility period you are assigned will be listed on your scheduling permit. You must take the exam during the eligibility period assigned to you.

If you are unable to take Step 1/Step 2 CK during the three-month eligibility period assigned to you, you may request a one-time, contiguous eligibility period extension (EPEX) using ECFMG's IWA. Refer to the [EPEX Overview](#) in IWA for more information and instructions.

If you do not take Step 1/Step 2 CK during your original or extended eligibility period or if you are unable to extend your eligibility period, you must reapply by submitting a new application and fee(s), if you wish to take the exam.

When you apply for Step 2 CS, you are assigned a 12-month eligibility period that begins on the date that the processing of your application is completed. Your eligibility period will be listed on your scheduling permit.

Once your Step 2 CS eligibility period has been assigned, it cannot be changed or extended. You can schedule a testing appointment for any available date in your eligibility period, and reschedule a testing appointment within your eligibility period. See [Scheduling the Examination](#) for more information. **If you do not take Step 2 CS during your assigned eligibility period, you must reapply by submitting a new application and examination fee, if you wish to take the exam.**

Testing Locations

Step 1 and Step 2 CK are delivered at Prometric test centers worldwide. Prometric's test centers are grouped into defined testing regions. When you apply for Step 1 or Step 2 CK, you must choose the testing region where you want to take the exam. A [list of Prometric testing regions](#) is available on the ECFMG website.

You can take the exam at any test center in your testing region that offers USMLE, provided there is space available on the date you choose. **The test centers available for USMLE Step 1 and Step 2 CK are subject to change.** To obtain current information on specific test centers, visit the [Prometric website](#) or follow instructions on the scheduling permit for contacting Prometric.

If you are unable to keep your Step 1 or Step 2 CK testing appointment at the test center you select, you can reschedule for a different test center within your testing region, subject to availability. To avoid a rescheduling fee, you must reschedule more than 30 calendar days before your scheduled testing appointment. Refer to your scheduling permit for details.

If you are unable to take Step 1 or Step 2 CK in the testing region you selected, you may request a change to your testing region. For more information, see the [Request to Change USMLE® Step 1/Step 2 CK Testing Region \(Form 312\)](#), available in the Resources section of the ECFMG website and from ECFMG, upon request.

Step 2 CS is administered at six test centers in five cities in the United States. Once you are registered for the exam, you will select a test center, subject to availability, when you schedule your testing appointment. If you are unable to keep your testing appointment at the test center you select, you can reschedule for a different center, subject to availability. To avoid a rescheduling fee, you must cancel or reschedule more than 14 calendar days before your scheduled testing appointment. Access [Step 2 CS Calendar and Scheduling](#) on the ECFMG website for more information.

Examinees with Disabilities Requesting Test Accommodations

The USMLE program provides reasonable accommodations for examinees with disabilities under the Americans with Disabilities Act (ADA). If you are an individual with such a disability and require test accommodations, visit the [USMLE website](#) before you apply for each Step or Step Component for information regarding test accommodations, including procedures and documentation requirements.

Examinees Who Require Additional Break Time

Examinees with physical or health conditions, such as lactation (to express breast milk) and diabetes (to monitor/treat blood glucose), may apply for additional break time. See the [USMLE Bulletin of Information](#) for more information.

Personal Item Exceptions (PIE)

Unauthorized possession of personal items while you are in the secure areas of the testing center is prohibited. Exceptions to this policy may be made in certain limited circumstances. See the [USMLE Bulletin of Information](#) for more information.

Important Note: Please note that ECFMG will not provide services of any kind if doing so would be considered violative of any applicable international, federal, state, or local laws or regulations. Additionally, ECFMG may delay or suspend provision of services while investigating whether the services or surrounding circumstances violate such laws, regulations, or ECFMG's policies and procedures.

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Scheduling the Examination

Once ECFMG verifies that you are eligible and your registration is complete, your scheduling permit will be issued. If you apply for more than one exam at the same time, you will be issued separate scheduling permits for each exam. Once your scheduling permit is available, ECFMG will send a notification to the e-mail address in your ECFMG record. **You will not receive the scheduling permit or notification by postal mail.**

Important Note: For Step 1 and Step 2 CK, if the beginning of your assigned eligibility period is more than six months in the future, your scheduling permit will not be available and the notification e-mail will not be sent until approximately six months before the beginning of the assigned eligibility period.

The scheduling permit is a very important document; it includes your assigned eligibility period, a description of the form(s) of identification you must bring to the test center on your exam date, and instructions for scheduling your testing appointment. You must bring your scheduling permit to the test center on your exam date. Your name, as it appears on your scheduling permit, must exactly match the name on your form(s) of identification. Please review your scheduling permit for details and limited exceptions. **If you do not bring a copy of your scheduling permit (electronic or paper) and required identification on each day of your exam, you will not be allowed to take the exam.** If you are not allowed to take the exam, you must pay a fee to reschedule your exam. Your rescheduled testing appointment must fall within your assigned eligibility period.

If the name listed on your scheduling permit is not correct, [contact ECFMG](#) immediately by e-mail, telephone, or fax. Use the contact information for General Inquiries on the Contact ECFMG page of the ECFMG website.

If the name in your ECFMG record is changed while you are registered for an exam, a revised scheduling permit reflecting this change will be issued. ECFMG will send you an e-mail notification when your revised scheduling permit is available. You must bring the revised scheduling permit to the test center. Name changes must be received **and processed** by ECFMG no later than seven business days before your testing appointment, or you will not be able to test. For Step 1 or Step 2 CK, if your eligibility period is extended or your testing region is changed while you are registered, a revised scheduling permit reflecting this change will be issued. You must bring the revised scheduling permit to the test center.

If you lose your scheduling permit, you can access it through [IWA](#).

Scheduling

You can schedule your testing appointment as soon as you obtain your exam scheduling permit. Please refer to your scheduling permit for instructions on reviewing available test dates and centers and scheduling a testing appointment. If you do not schedule and take the exam within your eligibility period, you must reapply by submitting a new application and exam fee(s), if you wish to take the exam.

Please refer to the schedule for reporting Step 2 CS results, available on the [ECFMG](#) and [USMLE](#) websites, **before scheduling a testing appointment if you need your Step 2 CS results by a specific deadline.**

Rescheduling

If you are unable to keep your Step 1 or Step 2 CK testing appointment, you are permitted to reschedule your appointment within your eligibility period. A fee is charged if a change is made during the 30 calendar days before your scheduled testing appointment. A fee schedule is posted on the [USMLE website](#). Refer to your scheduling permit for details on contacting Prometric to change your appointment.

If you cannot take the Step 1 or Step 2 CK exam during your assigned eligibility period, you may request a one-time, contiguous eligibility period extension (EPEX) using ECFMG's IWA. Refer to the [EPEX Overview](#) in IWA for more information and instructions.

If you cannot take the Step 1 or Step 2 CK exam in the testing region you selected, you may request to change your testing region. Refer to the [Request to Change USMLE® Step 1/Step 2 CK Testing Region \(Form 312\)](#) for details. This form is available in the Resources section of the ECFMG website and from ECFMG, upon request.

If you are unable to keep your Step 2 CS testing appointment, you are permitted to reschedule your appointment within your eligibility period. A fee is charged if a change is made during the 14 calendar days before your scheduled appointment. For instructions on canceling and rescheduling a Step 2 CS testing appointment, rescheduling fees, and to cancel or reschedule your appointment, access [Step 2 CS Calendar and Scheduling](#) on the ECFMG website.

Step 2 CS eligibility periods cannot be extended. If you do not take the exam within your eligibility period, you must reapply by submitting a new application and examination fee, if you wish to take the exam.

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Preparing for Examination

For detailed information on test lengths and formats see *The USMLE: Purpose, Test Format, and Test Lengths* in the [USMLE Bulletin of Information](#). See also *What Do I Need To Do: USMLE Checklist* in the *USMLE Bulletin of Information*.

Practice materials for all Steps and Step Components are available in the [Practice Materials](#) section of the USMLE website.

The NBME offers web-based self-assessments to help medical students and graduates evaluate their readiness for computer-based Steps and Step Components (Step 1, Step 2 CK, and Step 3). For complete information, see [NBME Self-Assessment Services](#) on the NBME website.

Practice Sessions for USMLE Step 1, Step 2 CK, and Step 3 are available at Prometric test centers to registered applicants for a fee. These sessions are provided primarily to give examinees the opportunity to become familiar with the Prometric test center environment. For more information, see [USMLE Computer-based Testing Practice Session](#) on the USMLE website.

Important Note: Test preparation courses and materials are available from individuals and companies not associated with the USMLE. It is unlawful for any test preparation service or program to use, disclose, distribute, or solicit content from recent test takers, or to otherwise provide access to questions or answers from actual USMLE exams. If there is evidence that you enrolled in, participated in, or used any test preparation program or service that distributes, provides access to, or uses USMLE content (questions or answers), or provides a forum for others to share such information, your registration and/or testing may be canceled, your scores on the USMLE may be withheld or canceled, and you may be subject to further sanctions. See *Irregular Behavior* in the [USMLE Bulletin of Information](#). ECFMG also regularly reviews allegations of irregular behavior in conjunction with its programs and services. See [Policies and Procedures Regarding Irregular Behavior](#), which may apply.

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Taking the Examination

For detailed information on arrival times, and procedures upon arrival and throughout the testing day, see *Examination Day and Testing* in the [USMLE Bulletin of Information](#). You should also refer to your scheduling permit for important information.

Important Note: After you start taking an examination, you cannot cancel or reschedule that examination. If you start the examination but do not complete it, the attempt may appear as "incomplete" on your USMLE transcript.

When you arrive at the test center, you must present your **scheduling permit** and the **required identification** as described on your scheduling permit. **If you do not bring a copy of your scheduling permit (electronic or paper) and required identification on each day of your exam, you will not be admitted to the test** and will be required to pay a fee to reschedule your test.

Your name, as it appears on your scheduling permit, must match the name on your form(s) of identification exactly. Please review your scheduling permit for details and limited exceptions. If the name listed on your scheduling permit is not correct, [contact ECFMG](#) immediately by e-mail, telephone, or fax. Use the contact information for General Inquiries on the Contact ECFMG page of the ECFMG website.

If the name in your ECFMG record is changed while you are registered for an exam, a revised scheduling permit reflecting this change will be issued. ECFMG will send you an e-mail notification when your revised scheduling permit is available. You must bring this revised scheduling permit to the test center. Name changes must be received **and processed** by ECFMG no later than seven business days before your testing appointment, or you will not be able to test. For Step 1 or Step 2 CK, if your eligibility period is extended or your testing region is changed while you are registered, a revised scheduling permit reflecting this change will be issued. You must bring the revised scheduling permit to the test center.

Required Identification

Your name, as it appears on your scheduling permit, must exactly match the name on your form(s) of identification. Please review your scheduling permit for details and limited exceptions. Since your name on the scheduling permit appears in the Latin alphabet (in "English language letters"), the name on your identification must also appear in the Latin alphabet. The spelling of the name on your scheduling permit must match **exactly** the spelling of the name on the form(s) of identification you present at the test center. If the names do not match as described above, you will not be allowed to take the exam. See [Your Name](#) in *Your ECFMG Record*.

The form of identification you present must be one of the forms of **unexpired**, government-issued identification listed below that contains your **name in the Latin alphabet**, your **signature**, and your recent **photograph**. The following forms of identification are acceptable, only if they meet all of these requirements:

- Passport
- Driver's license with photograph
- National identity card
- Other form of unexpired, government-issued identification

Travel Status

Applicants traveling to the United States to take an exam are responsible for making the necessary travel and accommodation arrangements. If you are neither a U.S. citizen nor a U.S. lawful permanent

resident, you are responsible for obtaining required travel documents. These documents may include a visa to enter the United States. The requirements of the U.S. Department of Homeland Security (DHS) and U.S. embassies and consulates regarding issuance of visas and travel to and from the United States are subject to change. You should review current requirements before applying for a visa. For additional information, visit the [DHS website](#) and the [U.S. Department of State website](#).

Step 2 CS is administered only in the United States. Upon request, ECFMG provides Step 2 CS applicants with a letter that may assist during the process of applying for a visa. The letter indicates that the applicant is registered for Step 2 CS, one of the exams required for ECFMG Certification. The letter also indicates that the applicant is required to travel to the United States to take the exam and provides the date by which the applicant must complete the exam. You can request this letter when you apply for Step 2 CS. After completion of the registration process, ECFMG will issue the letter, and it will be available to you through [IWA](#). If you are unable to obtain the appropriate visa to enter the United States to take Step 2 CS, you may request a full refund of the exam fee. See [Refunds](#) in *Your ECFMG Financial Account*.

If you are traveling from a distant location, you should consider arriving a day or two before the examination in order to be rested.

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USMLE Program and Irregular Behavior

The USMLE program defines irregular behavior as including, "any action by applicants, examinees, potential applicants, or others that could compromise the validity, integrity, or security of the USMLE process." Test center staff monitor, in person and via video/audio recording, administration of the USMLE Steps and are required to report any violations of the USMLE or test center rules. You must follow instructions from test center staff throughout the examinations; failure to do so may result in a finding that you have engaged in irregular behavior and permanent annotation of your USMLE transcript. See *Testing Regulations and Rules of Conduct* and *Irregular Behavior* in the [USMLE Bulletin of Information](#). See ECFMG's [Policies and Procedures Regarding Irregular Behavior](#), which also may apply.

Important Notes: Seeking, providing, and/or obtaining information relating to examination content that may give or attempt to give unfair advantage to anyone who may be taking the examination, which includes postings regarding examination content and/or answers on the Internet, is a violation of the USMLE Rules of Conduct.

Evidence of violation of any test administration rule, including the USMLE Rules of Conduct, will result in actions being taken under *USMLE Policies and Procedures Regarding Irregular Behavior*. If you are found to have engaged in irregular behavior, your score report and transcripts will include this finding, you may be barred from taking the USMLE in the future, and your score may be canceled.

Anomalous performance and/or unusual testing history may impact your access to the USMLE. If your performance raises concerns about your readiness to test or your motivation to pass, the USMLE program reserves the right to restrict your future access to its examinations and/or to impose conditions upon future access. Do not test if you are not able or not ready on your scheduled test date. Taking a Step examination to familiarize yourself with the examination format, or for any reason other than to pass, is prohibited and may result in restrictions on your future access to the USMLE.

The above-described conduct may also be considered irregular behavior under ECFMG's [Policies and Procedures Regarding Irregular Behavior](#).

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The United States Medical Licensing Examination (USMLE)

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Examination Results

The USMLE program provides a recommended pass or fail outcome on all Step examinations. For ECFMG Certification, you must obtain at least the USMLE-recommended pass outcome for each required Step or Step Component. See [Examination Requirements](#) in *Examinations for ECFMG Certification*.

Score Reporting

Results for Step 1 and 2 CK are typically available three to four weeks after your test date. However, a number of factors may delay score reporting. When selecting your test date and inquiring about results, you should allow at least eight weeks to receive notification that your score report is available. Results for Step 2 CS are available according to the Step 2 CS Schedule for Reporting Results, available on the [USMLE](#) and [ECFMG](#) websites. For more specific information about potential scoring delays, visit the Announcements section on the home page of the [USMLE website](#).

ECFMG reserves the right to reverify with the medical school the eligibility of medical school students and graduates who are registered for examination. If ECFMG requests reverification of your student/graduate status with your medical school, your score report will be issued only after reverification of your status has been received by ECFMG.

Score reports are issued in electronic format only and can be accessed using ECFMG's [OASIS](#); **you will not receive a paper score report by postal mail**. Once your score report has been issued, ECFMG will send a notification to the e-mail address in your ECFMG record.

Score reports are available for approximately 365 days from the date of e-mail notification. Once the score report is removed from OASIS, your results will be provided to you only in the form of an official USMLE transcript. To obtain a transcript, you will be required to submit a request and pay a fee through the organization that registered you for the examination. Therefore, it is strongly recommended that you print and/or save your score report while it is available.

Important Note: ECFMG may provide your medical school with data on your performance on administrations of USMLE Step 1, USMLE Step 2 CK, and USMLE Step 2 CS. Data provided include whether you passed or failed the exam administration, and, for Step 1 and Step 2 CK, your numerical score. You have the option to withhold your exam results from your medical school. See ECFMG's Provision of Performance Data to Medical Schools in [IWA](#) for more information.

See *Score Reporting* in the [USMLE Bulletin of Information](#) for additional information. For up-to-date information on minimum passing scores, examination performance data, and general scoring methodology, please visit the [USMLE website](#).

Score Validity

The USMLE program reserves the right to cancel scores that are at or above the passing level if the USMLE program has a good faith basis for questioning whether they represent a valid measure of knowledge or competence as sampled by the examination. If there are questions related to the validity of your score, your score report may be delayed or withheld pending completion of further review and/or investigation. See *Score Validity* in the [USMLE Bulletin of Information](#).

USMLE Transcripts

To request an official USMLE transcript, you must contact the organization that registered you for the examination. You must contact the Federation of State Medical Boards if you are registered for or have taken Step 3 and/or you want to send your transcript to a U.S. medical licensing authority. In all other

cases, submit your transcript request to ECFMG by sending a completed [Request for Official USMLE® Transcript \(Form 172\)](#), and the appropriate fee to ECFMG. Form 172 and additional information are available in the Resources section of the ECFMG website and from ECFMG, upon request. You can use [OASIS](#) to check whether your USMLE transcript has been sent.

If you apply to residency programs through the [Electronic Residency Application Service \(ERAS\)](#), you may request electronic transmittal of your USMLE transcript to these programs. For additional information, refer to the [ERAS applicant information](#) available in the ERAS Support Services section of the ECFMG website. Information on the status of requests for electronic transmittal of USMLE transcripts via ERAS is not available through OASIS. If the program does not participate in ERAS, you must submit a transcript request using Form 172 and pay the required fee.

Important Note: If you took the former ECFMG CSA, your USMLE transcript will indicate only that you have CSA examination history. It will not provide any additional information on your attempt(s) on the CSA. To request official copies of your CSA performance history, you must complete a [Request for an Official ECFMG® CSA® History Chart \(Form 297\)](#), and submit it to ECFMG with the appropriate fee. Form 297 is available in the Resources section of the ECFMG website and from ECFMG, upon request. For each attempt on the ECFMG CSA, the Official ECFMG CSA History Chart includes the month and year of the administration and the result of your performance. For additional information, refer to the instructions that accompany Form 297.

Score Rechecks

For all Steps and Step Components, a rigorous process is used to ensure the accuracy of scores, including a double scoring method involving independent scoring systems. Therefore, a change in your score or in your pass/fail outcome based on a recheck is an extremely remote possibility. To date, the score recheck process has not resulted in a score change. However, a recheck will be performed if you submit a [Request for Recheck of USMLE® Step 1, Step 2 CK, or Step 2 CS Score \(Form 265\)](#), and the fee for this service to ECFMG. Form 265 is available in the Resources section of the ECFMG website and from ECFMG, upon request. Your request must be received by ECFMG no later than 90 days after your result was released to you. See *Score Rechecks* in the [USMLE Bulletin of Information](#) for more information.

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Reexamination and Reapplication

USMLE policy generally does not allow applicants to retake a Step or Step Component if they have already passed that Step or Step Component. However, there are exceptions for the purpose of complying with a time limit imposed by a U.S. physician licensing authority or another authority recognized by the USMLE program. See 'Time Limit for Completing Examination Requirements' below.

If you fail a Step or Step Component, you must reapply, including payment of the appropriate fee(s), to retake the exam. If you do not take an exam during your assigned eligibility period, you must reapply, including payment of the appropriate fee(s), if you wish to take the exam; **in this event, you may reapply at any time, however, ECFMG cannot begin to process a subsequent application for this exam until at least four weeks after the end of the eligibility period for the exam you did not take.**

Number of Attempts Allowed

The USMLE program limits to six the total number of times an examinee can take the same Step or Step Component. An examinee is ineligible to take a Step or Step Component after **six or more prior attempts** to pass that Step or Step Component, including incomplete attempts. All attempts at a Step or Step Component are counted toward the limit, regardless of when the exams were taken.

For the purpose of U.S. medical licensure, state medical licensing authorities may limit the number of attempts allowed to pass each Step or Step Component. Information regarding specific state requirements can be obtained on the [Federation of State Medical Boards website](#).

Time Between Examination Attempts

The USMLE program has established rules on how quickly you can retake the same Step or Step Component. You may not take the same examination more than three times within a 12-month period. Your fourth and subsequent attempts must be at least 12 months after your first attempt at that exam **and** at least six months after your most recent attempt at that exam. This includes incomplete attempts.

Example: An examinee took and failed her first attempt at Step 1 on January 15, 2018, her second attempt at Step 1 on April 15, 2018, and her third attempt at Step 1 on September 15, 2018. In January 2019, the examinee applied for a fourth attempt at Step 1 and wanted the March-April-May eligibility period. The earliest date that was both 12 months after her first attempt on January 15, 2018 and six months after her most recent attempt on September 15, 2018 was March 15, 2019. Since the March-April-May eligibility period began before this date, the earliest eligibility period that the applicant could request was April-May-June.

When you reapply, your eligibility period will be adjusted, if necessary, to comply with these rules. You must read the editions of the ECFMG *Information Booklet* and the USMLE *Bulletin of Information* that pertain to the eligibility period in which you take the exam.

Time Limit for Completing Examination Requirements

For the purpose of ECFMG Certification, you must pass the USMLE Steps and Step Components required for ECFMG Certification within a seven-year period. If you do not pass all Steps and Step Components required for ECFMG Certification within a maximum of seven years, your earliest USMLE passing performance will no longer be valid for ECFMG Certification. See [Time Limit for Completing Examination Requirements](#) in *Examinations for ECFMG Certification*.

If you have passed a Step or Step Component but this passing performance is no longer valid for ECFMG Certification, you may request an exception to retake the previously passed exam that is no longer valid.

For the purpose of U.S. medical licensure, time limits to complete the USMLE are established by state medical licensing authorities and may require completion of all Steps or Step Components (including Step 3, which is not required for ECFMG Certification) within a certain number of years from the date the first Step is passed. Information regarding specific state requirements can be obtained on the [FSMB website](#). You may request an exception to retake a previously passed exam to comply with the time limit of a U.S. physician licensing authority. Visit the [USMLE website](#) for more information.

Important Notes: You may only request an exception at the time that you apply for the previously passed exam. Complete requirements and instructions will be provided at the time of exam application. Exceptions to the reexamination policy are not approved prior to your submitting the exam application.

Applicants who retake a previously passed Step or Step Component to comply with a time limit should understand the implications of a failing retake performance on their Step 3 eligibility. See *Retaking Previously Passed Steps* in the [USMLE Bulletin of Information](#).

If an applicant's earliest USMLE passing performance that is valid for ECFMG Certification took place before June 14, 2004, the applicant is required to pass only Step 1 and Step 2 CK within seven years of each other for ECFMG Certification; if required for ECFMG Certification, Step 2 CS can be passed outside the seven-year period. See [Time Limit for Completing Examination Requirements](#) in *Examinations for ECFMG Certification*. If this applicant passes Step 1 and Step 2 CK within a seven-year period, these passing performances will remain valid for ECFMG Certification, regardless of when Step 2 CS is taken and passed. **This applicant will not be eligible to retake Step 1 or Step 2 CK for the purpose of meeting a time limit imposed by a U.S. physician licensing authority until after he or she is certified by ECFMG.**

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Medical Education Credential Requirements

To be eligible for ECFMG Certification, you must have been awarded credit for at least four credit years (academic years for which credit has been given toward completion of the medical curriculum) by a medical school that is listed in the *World Directory* as meeting ECFMG eligibility requirements. Your graduation year must be included in the ECFMG note in your medical school's *World Directory* listing. See [Medical School Requirements](#). There are restrictions on credits transferred to the medical school that awards your medical degree that can be used to meet ECFMG's medical education credential requirements.

Important Notes: Graduates not eligible for admission to the exams or for ECFMG Certification include, but are not limited to: Graduates with degrees only in stomatology, ayurvedic or homeopathic medicine, or those awarded only the diploma of Physician-Epidemiologist-Hygienist, Physician-Biochemist, Physician- Cyberneticist, Physician-Biophysicist, Licensed Medical Practitioner, or Assistant Medical Practitioner.

Beginning in 2023, individuals will be eligible to apply for ECFMG Certification—the first step in the certification process—and take the required examinations if, at the time of application, their medical school is appropriately accredited. More specifically, the school must be accredited by an accrediting agency that is officially recognized by the World Federation for Medical Education (WFME) through its *Programme for Recognition of Accrediting Agencies*. Further details regarding the 2023 Medical School Accreditation Requirement, including eligibility guidelines, are available on the ECFMG website at www.ecfm.org/accreditation. International medical students and graduates interested in ECFMG Certification should monitor the ECFMG website for the latest information.

International medical graduates must document the completion of all requirements for, and receipt of, the **final medical diploma**. ECFMG verifies every international medical graduate's final medical diploma with the appropriate officials of the medical school that issued the diploma. When ECFMG requests verification of your medical diploma from your medical school, ECFMG will request the medical school to provide your **final medical school transcript**. Verification by ECFMG with the issuing school may also be required for transcripts that are submitted to document transferred credits. An international medical graduate's credentials are not considered complete until ECFMG receives and accepts verification of the final medical diploma, final medical school transcript, and, if required, transfer credit transcript(s) directly from the issuing school(s).

Please do not send original documents; copies of documents are sufficient. All documents submitted to ECFMG as part of the certification process, including translations, will become part of your permanent ECFMG record and will not be returned to you. Please do not send any credentials not required by ECFMG (such as licenses, certificates of full registration, high school diplomas, academic awards, etc.). Submission of unnecessary documents can delay the processing of your exam application.

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ECFMG Policy on Transfer Credits

Transfer credits are credits earned for a course taken at one institution (such as a medical school) that are accepted by a medical school toward meeting its degree requirements. For example, a student attends a medical school for one year and earns credits for 12 courses. The student transfers to another medical school, which accepts the credits for those 12 courses toward meeting its degree requirements. The credits for those 12 courses are then referred to as transfer credits.

If you transferred credits to the medical school that awarded or will award your medical degree, you must disclose and document these credits when you apply to ECFMG for examination, **regardless of when the credits were earned**. See [Credentials for ECFMG Certification](#) in *Medical Education Credentials*. Failure to disclose and document these credits may have a number of negative consequences, including delaying exam registration and certification by ECFMG, and may result in a finding of irregular behavior and permanent annotation of your ECFMG record. See [Policies and Procedures Regarding Irregular Behavior](#).

Additionally, for the purpose of ECFMG Certification, credits that are transferred to the medical school that awarded or will award your medical degree must meet **all** of the following criteria:

- All credits must have been transferred from a medical school that is either:
 - located in the United States or Canada and listed in the *World Directory*, or
 - listed in the *World Directory* as meeting ECFMG eligibility requirements.
- Credits must be for courses that were passed at the medical school at which the course was taken.
- Credits may only be transferred from **one** medical school to the medical school which awards the final degree.

If your transferred credits do not comply with all the criteria listed above, you will not meet the requirements to be registered by ECFMG for examination or the requirements to be certified by ECFMG. If your transferred credits do not meet **all** the criteria listed above, you may request an exception from the ECFMG Medical Education Credentials Committee.

Important Note: The requirement that credits must be transferred from a medical school that meets the criteria above does not apply to credits transferred **only to the pre-medical portion of the curriculum** of the medical school that awarded or will award the medical degree. If you transferred credits to the pre-medical portion of the curriculum at the medical school that awarded or will award your medical degree from an institution that does not meet the criteria listed above, you must provide ECFMG with a letter from the medical school that awarded or will award your medical degree confirming that the credits were transferred to the pre-medical portion of the curriculum only. This letter must be on the letterhead of the medical school and be signed by an authorized official of your medical school. This letter must be submitted in conjunction with the application for examination. Applications received without this letter may be rejected. **This letter is in addition to disclosing and documenting all transferred credits as described above.**

The intent of this policy on transfer credits is to preserve the appropriate education of medical school graduates applying to ECFMG for Certification. The provisions of this policy will be applied by ECFMG in its sole discretion in order to effectuate the intent of this policy.

Important Note: Transfer credits that ECFMG reviewed and deemed to have met requirements for ECFMG Certification prior to August 27, 2019, will remain acceptable, and these applicants will be allowed to proceed with Certification and the examinations leading to Certification. All future transfer activity will be subject to the policy as stated here.

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Credentials for ECFMG Certification

The credentials required for ECFMG Certification are:

- [Final Medical Diploma and Transcript](#)
- [Transcript\(s\) to Document Transferred Credits](#), if applicable

All documents that are not in English must be accompanied by an official [English translation](#) that meets ECFMG's translation requirements. See [Final Medical Diploma and Transcript](#), [Transcript\(s\) to Document Transferred Credits](#), and [English Translations](#) for complete information on required items.

Important Note: You must include your full name and USMLE/ECFMG Identification Number on the **front** of all credentials before sending them to ECFMG.

If you are a medical school graduate when you submit your first exam application, your diploma and transcript(s) to document transferred credits (if applicable) must be submitted with this initial exam application. If you have graduated and met all requirements for your medical diploma but your medical diploma has not yet been issued, a letter completed and signed by an authorized official of your medical school must be submitted with your exam application. Each medical school has been requested to provide ECFMG with a list of authorized officials. The letter you submit must be completed and signed by an official on this list. The official must provide his/her name, official title, and the institution name. The official must affix the institution's seal to the letter. The letter also must include the following statement:

This is to confirm that [applicant name] has graduated and completed all requirements to receive the [degree title] degree from [medical school/university name]. The degree will be issued [month and year].

You must then submit a copy of your diploma to ECFMG as soon as the diploma is issued.

If you graduated from medical school and do not submit a copy of your medical diploma or a letter from your medical school, as described above, and these documents have not been received previously by ECFMG, your exam application will be rejected.

If you are a medical school student when you submit your first exam application, submit copies of your medical education credentials as soon as you graduate and receive them.

You may not submit the credentials required for ECFMG Certification to ECFMG until you apply for an exam. If you send credentials to ECFMG before you apply for an exam, they will not be processed. To submit your credentials at the time of application, follow the instructions for additional documents in the exam application in ECFMG's IWA.

After you have applied for an exam, if you need to send credentials to ECFMG separately from an exam application, you must submit the credentials to ECFMG via the MyECFMG mobile app or via mail at the address below.

Educational Commission for Foreign Medical Graduates (ECFMG)
Attn: Certification Credentials Services
3624 Market St., 4th Floor
Philadelphia, PA 19104-2685
USA

If your credentials are complete, you are generally not required to resend these documents when you apply for subsequent exams.

ECFMG will not accept letters or other deliveries that arrive with postage or other fees due.

When your credentials have been processed, ECFMG will notify you. You can also check the status of your credentials by accessing [OASIS](#) or the [MyECFMG mobile app](#). If you have questions or concerns about your credentials, you can [contact ECFMG](#) using the contact information for General Inquiries on the Contact ECFMG page of the ECFMG website.

Documents submitted to ECFMG as part of the exam application and certification processes, including translations, will not be returned.

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Final Medical Diploma and Transcript

Final Medical Diploma

ECFMG requires all medical school graduates to submit a copy of their final medical diploma to ECFMG. Do not send an original diploma. You must submit the copy of your diploma to ECFMG via the [MyECFMG mobile app](#) or via mail or courier service. The exact degree title of the final medical diploma you must have earned (and must provide) in order to be eligible for ECFMG Certification and the examinations required for Certification is listed in the [Reference Guide for Medical Education Credentials](#) on the ECFMG website. The *Reference Guide* lists these medical credential qualifications by country of medical school. Although this *Reference Guide* is based upon information that was current at the time of publication, this information is subject to change.

If you are mailing a copy of your medical diploma, the photocopy **must be 216 mm x 279 mm (8½ in x 11 in)**. **If the document is larger than 216 mm x 279 mm (8½ in x 11 in), you must send a reduced photocopy that is 216 mm x 279 mm (8½ in x 11 in).**

You must submit the copy of the final medical diploma in the original language, containing the issue date and all of the appropriate signatures of the medical school and/or university officials. Documents that are not in English must be accompanied by an official English translation. ECFMG will not accept a copy of a medical diploma that is not in English without an official English translation. Likewise, ECFMG will not accept an English translation of a diploma without a copy of the original language document from which the English translation was prepared. See [English Translations](#) in *Medical Education Credentials*.

Do not submit professional evaluations of your final medical diploma. ECFMG does not accept such evaluations in lieu of your final medical diploma.

If you are submitting the copy of your medical diploma with an exam application, follow the instructions for additional documents in the exam application in ECFMG's IWA.

The name on your medical diploma should match **exactly** the name in your ECFMG record. If the name on your diploma does not match the name in your ECFMG record, you must submit documentation that **verifies** the name on your diploma is (or was) your name. See [Name on Medical Diploma and Transcript\(s\)](#) in *Medical Education Credentials*.

Final Medical School Transcript

When ECFMG requests verification of your medical diploma from your medical school, ECFMG will request the medical school to provide your final medical school transcript. If ECFMG is unable to obtain your final medical school transcript directly from your medical school, ECFMG will contact you and provide detailed instructions.

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Transcript(s) to Document Transferred Credits

If you have transferred credits to the medical school that awarded or will award your medical degree, you must document these credits when you apply for examination, regardless of when the credits were earned. You must send to ECFMG a copy of an official transcript issued by the school or institution at which the course was taken. You must submit the copy of your transcript to ECFMG via the MyECFMG mobile app or via mail or courier service.

If you are mailing a copy of the transcript, the photocopy **must be 216 mm x 279 mm (8½ in x 11 in). If the document is larger than 216 mm x 279 mm (8½ in x 11 in), you must send a reduced photocopy that is 216 mm x 279 mm (8½ in x 11 in).**

You must submit the copy of the transcript in the original language. Documents that are not in English must be accompanied by an official English translation. ECFMG will not accept a copy of a transcript that is not in English without an official English translation. Likewise, ECFMG will not accept an English translation of a transcript without a copy of the original language document from which the English translation was prepared. See [English Translations](#) in *Medical Education Credentials*.

Do not submit professional evaluations of your transcript. ECFMG does not accept such evaluations in lieu of your transcript.

To submit the transcript to ECFMG, follow the instructions for additional documents in the exam application in ECFMG's IWA.

The name on your transcript(s) to document transferred credits should match **exactly** the name in your ECFMG record. If the name on your transcript does not match the name in your ECFMG record, you must submit documentation that **verifies** the name on your transcript is (or was) your name. See [Name on Medical Diploma and Transcript\(s\)](#) in *Medical Education Credentials*.

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Name on Medical Diploma and Transcript(s)

Your name as it appears on **all** credentials sent to ECFMG should be consistent and should match **exactly** the name in your ECFMG record. If the names do not match exactly, you must submit documentation that **verifies** the name on your medical diploma/transcript(s) is (or was) your name. The documentation must show your name exactly as it appears on your medical diploma/transcript(s). See [Your Name](#) in *Your ECFMG Record* and [Verifying Your Name](#).

If the name on your credentials does not match the name in your ECFMG record and you do not submit acceptable documentation that verifies the name on your credentials is (or was) your name, your exam application will be rejected. If your exam application is rejected due to a name discrepancy, ECFMG will contact you to request additional information.

An example of a discrepancy that requires such verification would be if your ECFMG record lists your married name, but your medical diploma/transcript(s) lists your maiden name.

Verifying Your Name

If the name in your ECFMG record does not match **exactly** your name as listed on your medical diploma, transcript, or other credential, you must **verify** that the name on these documents is (or was) your name. To verify your name, submit to ECFMG a copy of one of the documents listed below that verifies the name on your medical diploma, transcript, or other credential. The name in your ECFMG record will not be changed if you are verifying your name.

For the purpose of verifying your name, examples of the document(s) you may submit include:

- Expired Passport (including the pages with your photograph and the expiration date)
- Birth Certificate
- Marriage Certificate/License (if name discrepancy is due to name change after marriage)
- Official Court Order/Name Change Documentation
- Official Immigration Document, including
 - U.S. Resident Alien Card
 - U.S. Naturalization Certificate
 - Permanent Residence Card
- Driver's License

If additional documentation is required for the purposes of verifying your name, and you cannot provide one of the documents listed above, ECFMG will consider accepting a letter from an authorized official of your medical school that verifies that the name on your medical diploma, transcript, or other credential is (or was) your name. If you choose to submit a letter from your medical school to verify the name on your credential, the letter must be completed and signed by an authorized official of your medical school. Each medical school has been requested to provide ECFMG with a list of authorized officials. The letter you submit must be completed and signed by an official on this list. The official must provide his/her name, official title, and the institution name. The official must also affix the institution's seal to the letter. The letter must be on letterhead and must include the following statement:

This certifies that the names [name on document] and [name in ECFMG record] belong to one and the same person.

See additional important information on documents below.

Important Information on Documents for Changing or Verifying Your Name

- Attestations are **not** acceptable as documentation to change or verify your name.
- Please do not submit an original document; a copy of the document is sufficient.
- All documents submitted to change or verify your name that are not in English must be accompanied by an official English translation that meets ECFMG's translation requirements. See [English Translations](#) in *Medical Education Credentials*.
- All documents submitted to change or verify your name, including translations, will become a part of your permanent ECFMG record and will not be returned to you.

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Medical Education Credentials

[Medical Education Credential Requirements](#) | [Transfer Credits](#) | [Credentials for ECFMG Certification](#) | [Final Medical Diploma and Transcript](#) | [Transcript\(s\) to Document Transferred Credits](#) | [Name on Medical Diploma and Transcript\(s\)](#) | [English Translations](#) | [Verification of Credentials](#)

English Translations

Any document submitted to ECFMG that is not in English must be accompanied by an English translation that meets ECFMG's translation requirements.

ECFMG strongly encourages you to obtain translations from its recommended translation service. Translations from this service meet ECFMG's requirements and will not be rejected due to translation errors. See the [Translation Service](#) page in the Resources section of the ECFMG website.

Translations from other services may not meet ECFMG's requirements. If you obtain a translation from another service, the translation must:

- be a word-for-word translation of the original language document. An abstract or summary translation of the document is not acceptable.
- be prepared from the original document or a photocopy of the original document. ECFMG will not accept a translation prepared from a transcription (transcribed version) of the document.
- be prepared by a government official (for example, a Consular Officer), medical school official (for example, a Dean or Registrar), or a professional translation service.
- bear the signature and title of the government or medical school official or representative of the translation service and, if there is one, the seal of the government official, medical school, or translation service.
- appear on letterhead. If the translation service is a private company, the letterhead must identify the company as a translation service.
- **include a certification statement from the translator stating the following: I [insert name of translator] certify that the word-for-word translation is correct.**

An English language certificate issued by the medical school that is not a word-for-word English language version of the degree, transcript, or other document in the original language is not acceptable as a translation. English translations that do not meet the requirements above will not be accepted. Examples of unacceptable translations include, but are not limited to:

- translations prepared by a notary who is not a government or medical school official or representative of a professional translation service,
- a translation that was not signed by the translator or official or representative of the translation service,
- a translation that is not a word-for-word translation of the original language document, and
- a translation that does not contain the certification statement from the translator.

Additionally, applicants are not permitted to translate their own documents.

Documents submitted to ECFMG as part of the exam application and certification processes, including translations, will not be returned.

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Verification of Credentials

ECFMG verifies every international medical graduate's final medical diploma with the appropriate officials of the medical school that issued the diploma. At the same time, ECFMG requests the medical school to provide the final medical school transcript. Transcripts to document transferred credits are also subject to verification by ECFMG with the issuing school. You will not fulfill the ECFMG medical education credential requirements until verification of your final medical diploma, final medical school transcript, and, if required, transfer credit transcript(s) is received directly from the issuing school(s) and accepted by ECFMG.

ECFMG will notify you when your diploma has been sent to your medical school for verification. As part of the verification process, ECFMG also may provide the medical school with other documents, including a copy of your *Certification of Identification Form* (Form 186), to aid in identification. ECFMG will follow up with your medical school if the requested verification is not received in a timely manner. ECFMG will notify you after receiving and evaluating the verification from your medical school. You can check the status of your medical education credentials on-line using [OASIS](#).

ECFMG reserves the right to reverify with the medical school the eligibility of medical school graduates who apply for examination. This may include reverification of the graduate's medical education credentials with the issuing medical school. If such reverification is requested, the graduate will be registered for examination only after ECFMG has received reverification directly from the medical school. If reverification is requested after the graduate has been registered for examination, ECFMG may cancel the graduate's registration or withhold the graduate's score report until ECFMG has received reverification directly from the issuing school. If your registration is canceled, you may be required to reapply.

Important Notes: Applicants are responsible for any fees associated with the verification of the final medical diploma, final medical school transcript, and transcript(s) to document transferred credits. If your medical school charges a fee for the verification of your diploma and/or transcript, ECFMG will advise you to contact your medical school directly regarding the fee and the method of payment.

If the final medical school transcript provided by your medical school is not in English or if an acceptable English translation is not provided by the medical school, ECFMG will have the transcript translated into English by an independent translation service. ECFMG will charge your ECFMG financial account for the translation, and will subsequently notify you of the charge. ECFMG will not notify you before sending the document for translation. For information on the translation fee, see the [Fees](#) page in the Resources section of the ECFMG website. See [Methods of Payment](#) in *Your ECFMG Financial Account* for information on how to make a payment to your ECFMG financial account.

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Related ECFMG Services

Confirming ECFMG Certification to Third Parties | [Electronic Residency Application Service \(ERAS\) Support Services](#) | [J-1 Visa Sponsorship](#) | [ECFMG Certificate Holders Office](#)

Confirming ECFMG Certification to Third Parties

ECFMG's Certification Verification Service (CVS) provides primary-source confirmation of the ECFMG certification status of international medical graduates. The Joint Commission, the organization that evaluates and accredits U.S. health care organizations and programs, has determined that direct verification with ECFMG of a physician's certification status satisfies The Joint Commission's requirement for primary-source verification of medical school completion for graduates of international medical schools.

ECFMG will confirm your certification status when a request is received from a U.S. medical licensing authority, residency program, hospital, or other organization that, in the judgment of ECFMG, has a legitimate interest in such information. For status reports sent to **medical licensing authorities**, the request can also be made by you. Requesting organizations must normally secure and retain your signed authorization to obtain certification information. Please note that there may be a fee for this service.

Requests for confirmation must contain your name, date of birth, USMLE/ECFMG Identification Number, and name and address of the organization to which the confirmation should be sent. To obtain the appropriate request form or to make an on-line request, visit the CVS section of the ECFMG website at www.ecfm.org/cvs. Confirmations are sent to the requesting organization within approximately two weeks. Confirmations are not sent to applicants directly.

If the requesting organization requests to receive a paper report but does not receive the report, ECFMG will honor requests for duplicate reports at no additional cost up to 90 days after the date that the original report was processed.

If you apply to residency programs through the Electronic Residency Application Service (ERAS), ECFMG will transmit an electronic ECFMG Status Report automatically to the ERAS application, where it can be accessed by all of the programs to which you apply. If your ECFMG certification status changes during the ERAS application season, ECFMG will transmit an updated status report automatically to the ERAS application, where it can be accessed by all of the programs to which you apply.

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Electronic Residency Application Service (ERAS®) Support Services

The Accreditation Council for Graduate Medical Education (ACGME) requires that international medical graduates who wish to enter ACGME-accredited graduate medical education programs in the United States be certified by ECFMG. ECFMG Certification does not, however, guarantee that an international medical graduate will be accepted into a graduate medical education program; the number of applicants for residency and fellowship programs each year exceeds the number of available positions.

The Association of American Medical Colleges (AAMC) established the Electronic Residency Application Service (ERAS) to allow medical students and graduates to apply electronically for residency positions in accredited U.S. programs of graduate medical education. Most U.S. graduate medical education programs participate in ERAS. If you apply to participating programs, you must submit your residency application using ERAS.

Since ERAS was established, ECFMG has served as the designated Dean's office for students and graduates of international medical schools, assisting these individuals with the ERAS application process for first- and second-year (PGY-1 and PGY-2) residency positions.

International medical students and graduates who apply to programs that participate in ERAS must request an ERAS Token, a unique identification number, from ECFMG. The Token allows applicants to access AAMC's MyERAS website, where they can complete their residency application, select the programs to which they will apply, and assign supporting documents to these programs.

As the designated Dean's office, ECFMG receives supporting documents for the ERAS application, such as medical student performance evaluations (MSPEs), medical school transcripts, and photographs from applicants and their medical schools. ECFMG then transmits these documents to the ERAS application. ECFMG also transmits to the ERAS application the applicant's ECFMG Status Report, which includes the applicant's ECFMG certification status and, if requested by the applicant, his/her USMLE transcript. Once supporting documents have been received by the ERAS application, they can be accessed by the programs to which the applicant has applied.

For detailed, up-to-date information on ERAS Support Services at ECFMG, visit the ERAS section of the ECFMG website at www.ecfm.org/eras.

Important Note About U.S. State Medical Licensure Requirements: In the United States, medical licensure requirements vary by individual state medical licensing authorities. You should be aware that:

- A training or restricted license may be required to participate in programs of graduate medical education. Participants in graduate medical education programs may also be required to obtain an unrestricted medical license by a certain point in their training in order to progress in the program.
- Some states have established additional criteria with respect to international medical schools for the purpose of eligibility for licensure. When you plan to apply to residency programs, consult the state's medical licensing board to determine if graduates of your medical school are eligible for licensure in that state.
- If you are certified by ECFMG based on **former** medical science exams (such as the Visa Qualifying Examination [VQE] or the Foreign Medical Graduate Examination in the Medical Sciences [FMGEMS]), you should be aware that these exams may not be acceptable for the purpose of eligibility for a training license.

ECFMG does not create or control the medical licensure requirements for any jurisdiction and does not create or control the eligibility requirements for any graduate medical education program. Additionally, ERAS does not preclude any students or graduates from participating in ERAS, based on their eligibility for licensure. Before applying to residency programs in a given state, it is your responsibility to become familiar with that state's licensure requirements and to ensure that you

meet any licensure requirements to enter and complete residency training in that state. For a directory of U.S. state medical licensing authorities, visit the [Federation of State Medical Boards website](#).

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Related ECFMG Services

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J-1 Visa Sponsorship

Foreign national physicians who seek entry into U.S. programs of graduate medical education or training must obtain an appropriate visa that permits clinical training activities. One visa commonly used by foreign national physicians is the J-1, a temporary nonimmigrant visa reserved for participants in the Exchange Visitor Program. As a public diplomacy initiative of the U.S. Department of State, the Exchange Visitor Program was established to enhance international educational and cultural exchange between the people of the United States and other nations. In keeping with the program's goals for international education, exchange visitor (J-1) physicians are required to return home for at least two years following their training before being eligible for certain U.S. visas.

The U.S. Department of State has designated ECFMG as the visa sponsor for all exchange visitor (J-1) physicians who participate in clinical training programs. ECFMG sponsorship is also available for physicians' eligible dependents. As the visa sponsor, ECFMG processes applications for J-1 visa sponsorship and, for eligible applicants, issues a document that the applicant can use to apply for the J-1 visa. ECFMG is responsible for ensuring that exchange visitor (J-1) physicians and host institutions meet the federal requirements for participation throughout the duration of sponsorship. ECFMG does not sponsor physicians for other U.S. visa types.

All initial applicants for ECFMG J-1 sponsorship are advised that sponsorship eligibility should not be presumed and cannot be determined until a complete review of an individual's U.S. visa history has been conducted.

For detailed, up-to-date information on J-1 visa sponsorship by ECFMG, visit the Exchange Visitor Sponsorship Program (EVSP) section of the ECFMG website at www.ecfm.org/evsp.

Important Note: Foreign national physicians who are international medical graduates and are seeking ECFMG J-1 visa sponsorship to enroll in graduate medical education programs must, among other requirements, have passed USMLE Step 1 and Step 2 CK; or the former Visa Qualifying Examination (VQE), National Board of Medical Examiners (NBME) Part 1 and Part 2, or Foreign Medical Graduate Examination in the Medical Sciences (FMGEMS) examinations; or an acceptable combination thereof. The former one-day ECFMG Examination and three-day Federation Licensing Examination (FLEX) do **not** meet the requirements for J-1 visa sponsorship.

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ECFMG Certificate Holders Office

The ECFMG Certificate Holders Office (ECHOSM) provides career planning resources for physicians pursuing ECFMG Certification and graduate medical education (GME) in the United States.

Be connected.

Use ECHO to stay connected with ECFMG and its expertise, programs, and services for international physicians. ECHO also provides connections to information from other organizations and experts. Through ECHO's IMG Advisors Network (IAN), you also can connect with ECFMG-certified physicians to ask questions about U.S. GME and about living and working in the United States. [Subscribe](#) to *ECHO News*, a free e-newsletter, to receive updates on resources, important deadlines, and more.

Be heard.

Your ideas are important to us. Let us know what you think about ECHO — what you like, what you don't like, what you want to see more of, what we can do to make ECHO a better resource for ECFMG-certified physicians. Contact ECHO using our [feedback](#) form.

Be informed.

Successfully navigating the application process for U.S. GME can be difficult. You need to interact with multiple organizations, each with its own roles, requirements, processes, and deadlines. ECHO provides resources that you can use when applying to U.S. GME programs as well as resources that address the practical challenges of relocating to the United States and adjusting to the U.S. GME and health care systems.

For more information, visit the ECHO section of the ECFMG website at www.ecfm.org/echo.

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EXHIBIT B



January 13, 2021

Re: Dr. Rajan Patel
USMLE®/ECFMG® Identification No. 0-876-556-2

To whom it may concern:

This letter is being provided to Dr. Patel, at his request, to provide to personnel at Prometric Test Centers. The United States Medical Licensing Examinations (USMLE) Step 1 and Step 2 CK are currently administered by Prometric.

All applicants for ECFMG Certification (including Dr. Rajan Patel) are required to pass those USMLE Steps and Step Components required for ECFMG Certification within a seven-year period. ECFMG will consider request for exception to this from applicants who fail to meet this requirement because of extraordinary circumstances. Such requests are only considered once the individual has successfully passed all the requisite examinations.

Dr. Patel has not met this seven-year requirement and would like to request an exception from ECFMG. He is currently registered for the USMLE Step 2 Clinical Knowledge (CK).

Dr. Patel has advised ECFMG that he has been prevented from testing at Prometric Centers for USMLE because he cannot comply with Prometric's requirement that test-takers wear masks while testing. Dr. Patel has advised ECFMG that he is unable to wear a mask due to medical reasons.

Any consideration you can provide Dr. Patel in permitting him to test as soon as possible will be greatly appreciated. If you have any questions regarding this process, please feel free to contact me at kcorrado@ecfmq.org.

Sincerely,

A handwritten signature in blue ink that reads "kcorrado".

Ms. Kara Corrado, J.D.
Vice President for Operations